

EXHIBIT M

EXHIBIT A

Awni Abu Hba
April 07, 2021

1

Page 1

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x
5 SHABTAI SCOTT SHATSKY, ET AL.,

6 Plaintiffs,

7 Civil No.:
8 8 CIV. 12355 (MKV)

9 -against-

10 THE PALESTINE LIBERATION ORGANIZATION, ET AL.,

11 Defendants.

12 - - - - -x

13 DEPOSITION OF

14 Awni Abu Hba

15 Taken on April 7, 2021

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Awni Abu Hba
April 07, 2021

2 to 5

Page 2				Page 4			
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2	I N D E X			2	*****		
3	WITNESS	EXAMINATION BY	PAGE	3	VIDEO-RECORDED REALTIME DEPOSITION of AWNI ABU HBDA,		
4	AWNI ABU HBDA	MR. SINAIKO	10	4	held on April 7, 2021, at 9:38 a.m., was sworn		
5	AWNI ABU HBDA	MR. BERGER	154	5	before AMBRIA IANAZZI, a Registered Professional		
6				6	Reporter, Certified Realtime Reporter, and Notary		
7				7	Public.		
8				8	*****		
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Page 3				Page 5			
1				1			
2	(CONT'D)			2	A P P E A R A N C E S:		
3	I N D E X			3			
4	MARKED FOR IDENTIFICATION			4	COHEN & GRESSER LLP		
5	EXHIBIT	DESCRIPTION	PAGE	5	Counsel for Plaintiffs		
6	Exhibit 1	Subpoena	18	6	800 Third Avenue		
7	Exhibit 2	Tab 1	28	7	New York, New York 10022		
8	Exhibit 3	Tab 8	32	8	BY: STEPHEN M. SINAIKO, ESQ.		
9	Exhibit 4	Tab 2	52	9	ssinaiko@cohengresser.com		
10	Exhibit 5	Declaration of C. Russell	70	10	ERICA LAI, ESQ.		
11	Exhibit 6	Subpoena to Produce	120	11	elai@cohengresser.com		
12	Exhibit 7	Tab 13	124	12	ANDREW PECORARO, ESQ.		
13	Exhibit 8	Tab 15	127	13	apecoraro@cohengresser.com		
14	Exhibit 9	Tab 11	136	14	SQUIRE PATTON BOGGS		
15				15	Attorneys for Defendants		
16				16	1211 6th Avenue, 26th Floor		
17				17	New York, New York 10036		
18				18	BY: MITCHELL BERGER, ESQ.		
19				19	mitchell.berger@squirepb.com		
20				20	GASSAN A. BALOUL, ESQ.		
21				21	gassan.baloul@squirepb.com		
22				22	JOSEPH ALONZO, ESQ.		
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24				24	SALIM KADDOURA, ESQ.		
25				25	salim.kaddoura@squirepb.com		

Awni Abu Hbda
April 07, 2021

6 to 9

<p style="text-align: right;">Page 6</p> <p>1</p> <p>2 (CONT'D)</p> <p>3 A P P E A R A N C E S:</p> <p>4</p> <p>5 ALSO PRESENT:</p> <p>6</p> <p>7 COSETTE VINCENT, Cohen & Gresser</p> <p>8 ELIZABETH BEZVERKHA, Cohen & Gresser</p> <p>9 HADEER AL AMIRI, Interpreter</p> <p>10 NAWEL MESSAOUDI, Interpreter</p> <p>11 COREY WAINAINA, Videographer</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1</p> <p>2 THE VIDEOGRAPHER: Good morning. We are</p> <p>3 now on the record. The participants should be</p> <p>4 aware that this proceeding is being recorded, and,</p> <p>5 as such, all conversations held will be recorded,</p> <p>6 unless there is a request and agreement to go off</p> <p>7 the record. This is the remote video-recorded</p> <p>8 deposition of Awni Abu Hbda. Today is Wednesday,</p> <p>9 April 7th, 2021. The time is now 13:39 UTC.</p> <p>10 We are here in the matter of Shatsky</p> <p>11 versus PLO. My name is Corey Wainaina. I am the</p> <p>12 remote video technician on behalf of U.S. Legal</p> <p>13 Video Support, located at 90 Broad Street, New</p> <p>14 York, New York. I'm not related to any of the</p> <p>15 Parties in the Action, nor am I financially</p> <p>16 interested in the outcome of the case.</p> <p>17 At this time, will the court reporter,</p> <p>18 Ambria Ianazzi, on behalf of U.S. Legal Support,</p> <p>19 please enter the statement for remote proceeding</p> <p>20 into the record.</p> <p>21 MR. SINAIKO: Before we get started with</p> <p>22 Mr. Abu Hbda, I would just like to go around to</p> <p>23 counsel on the call and confirm that we all</p> <p>24 stipulate under the Rule 29 of the Federal Rules</p> <p>25 of Civil Procedure that Ms. Ianazzi, although</p>
<p style="text-align: right;">Page 7</p> <p>1</p> <p>2 - o o o -</p> <p>3</p> <p>4 A W N I A B U H B D A, the WITNESS</p> <p>5 herein, after having been first duly sworn by</p> <p>6 a Notary Public, was examined and testified</p> <p>7 through an</p> <p>8 interpreter as follows:</p> <p>9</p> <p>10 - o o o -</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 9</p> <p>1</p> <p>2 she's in New York, is an appropriate officer</p> <p>3 before whom to take this deposition; does</p> <p>4 everybody so stipulate?</p> <p>5 MR. BERGER: For Defendants, yes. This is</p> <p>6 Mitchell Berger from Squire, Patton, Boggs.</p> <p>7 MR. SINAIKO: And Counsel for the Witness?</p> <p>8 MS. KROFF: We're fine with that. Thank</p> <p>9 you.</p> <p>10 MR. SINAIKO: Okay.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 10</p> <p>1 A. ABU HBDA</p> <p>2 EXAMINATION BY</p> <p>3 MR. SINAIKO:</p> <p>4 Q. And Mr. Abu Hbda, let me introduce myself.</p> <p>5 My name is Steve Sinaiko. I'm a partner in the law</p> <p>6 firm Cohen & Gresser LLP. We represent the</p> <p>7 Plaintiffs in this litigation and we appreciate you</p> <p>8 being here today. Have you ever had your deposition</p> <p>9 taken before, Mr. Abu Hbda?</p> <p>10 A. No.</p> <p>11 Q. Okay. Have you ever testified in court,</p> <p>12 in the United States, prior to today?</p> <p>13 A. No.</p> <p>14 Q. Okay. I'm just going to take a couple of</p> <p>15 minutes to go over some ground rules for our</p> <p>16 deposition today. First of all, you are here on the</p> <p>17 record. There is a court reporter and a</p> <p>18 videographer recording everything that we say today.</p> <p>19 In order to ensure that we have an</p> <p>20 accurate record, and especially because this</p> <p>21 deposition is being taken by videoconference,</p> <p>22 instead of in person, due to the COVID-19 Pandemic,</p> <p>23 it's important that we not speak over one another,</p> <p>24 and more than one person speaks at a time.</p> <p>25 So, I would be grateful if you wait until</p>	<p style="text-align: right;">Page 12</p> <p>1 A. ABU HBDA</p> <p>2 - o o o -</p> <p>3</p> <p>4 N A W E L M E S S A O U D I,</p> <p>5 Called as the interpreter in this</p> <p>6 matter, was duly sworn by a Notary Public to</p> <p>7 accurately and faithfully translate the</p> <p>8 questions propounded to the Awni Abu Hbda</p> <p>9 from English into Arabic, and the answers</p> <p>10 given by the Awni Abu Hbda from Arabic into</p> <p>11 English.</p> <p>12</p> <p>13 - o o o -</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 11</p> <p>1 A. ABU HBDA</p> <p>2 I finish my questions before you start answering</p> <p>3 them, and, of course, I'll try to wait until you</p> <p>4 finish your answers before I ask my next question;</p> <p>5 is that okay?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 MS. KROPF: And sorry to interrupt, I</p> <p>9 think we'll have the translator translate your</p> <p>10 questions going forward; is that okay?</p> <p>11 MR. SINAIKO: For the record, all my</p> <p>12 questions are being translated by the translator.</p> <p>13 Mr. Abu Hbda is being translated, answering the</p> <p>14 questions in English, and the questions are not</p> <p>15 being translated at this time.</p> <p>16 Q. Okay. As we work through our questions</p> <p>17 today, it's important that you respond to questions</p> <p>18 verbally because the court reporter and the record</p> <p>19 can't capture nods of the head, or gestures of the</p> <p>20 hand, so it's important to give verbal answers to my</p> <p>21 questions; is that okay?</p> <p>22 THE INTERPRETER: Yeah. I'm supposed to</p> <p>23 swear first. I'm sorry.</p> <p>24 MR. SINAIKO: Oh, we need to swear in the</p> <p>25 translator.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. ABU HBDA</p> <p>2 THE INTERPRETER: I'm sorry, I'm not</p> <p>3 supposed to do before the oath.</p> <p>4 Q. Okay. Mr. Abu Hbda, let's just -- let's</p> <p>5 just go back and translate, for Mr. Abu Hbda, my</p> <p>6 last question.</p> <p>7 THE INTERPRETER: Can you please repeat</p> <p>8 it?</p> <p>9 MR. SINAIKO: Oh, certainly.</p> <p>10 Q. As we go through our questions today,</p> <p>11 Mr. Abu Hbda, it's important that you give verbal</p> <p>12 answers, because the court reporter will not be able</p> <p>13 to capture, and the record will not be able capture,</p> <p>14 head nods and hand gestures.</p> <p>15 So, do you understand that you will need</p> <p>16 to give verbal answers to the questions that I ask</p> <p>17 you today?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 A. Thank you.</p> <p>21 Q. So, Mr. Abu Hbda, I'm going to be asking</p> <p>22 you a series of questions today. If at any time,</p> <p>23 there's a question you don't understand, please let</p> <p>24 me know, and I'll try to rephrase the question for</p> <p>25 you, or make it more clear. But understand that if</p>

<p style="text-align: right;">Page 14</p> <p>1 A. ABU HBDA</p> <p>2 you do answer a question, I will assume, and the</p> <p>3 Court will assume, and everyone in this room will</p> <p>4 assume, that you understood each question that you</p> <p>5 respond to; do you understand?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. It is possible that during the</p> <p>8 course of our deposition today, your counsel or one</p> <p>9 of the other lawyers in the room may object to one</p> <p>10 of my questions. Unless your counsel instructs you</p> <p>11 not to answer a question that I've asked you, and</p> <p>12 your counsel is the only person who's permitted to</p> <p>13 so instruct you, you should answer my questions</p> <p>14 without regard to any objections that may be raised</p> <p>15 by any of the lawyers in the room; do you</p> <p>16 understand?</p> <p>17 A. Yes. Okay.</p> <p>18 MR. SINAICO: Just for the record, I</p> <p>19 think -- I think, going forward, the translator</p> <p>20 has been translating Mr. Abu Hbda's answers, and I</p> <p>21 think it's just going to go more smoothly if we</p> <p>22 have all of the answers translated, just for the</p> <p>23 record. I know that the answers have all been</p> <p>24 translated.</p> <p>25 And, you know, Sara, unless you object to</p>	<p style="text-align: right;">Page 16</p> <p>1 A. ABU HBDA</p> <p>2 MR. BERGER: Yeah. If the translator is</p> <p>3 translating it from the realtime, we would like to</p> <p>4 have it.</p> <p>5 MR. SINAICO: Okay. Great. So, we could</p> <p>6 reach out to the support people from U.S. Legal,</p> <p>7 so you could have the realtime.</p> <p>8 THE VIDEOGRAPHER: You guys want to go off</p> <p>9 the record?</p> <p>10 MR. MR. SINAICO: Let's go off the record.</p> <p>11 THE VIDEOGRAPHER: The time is 13:55.</p> <p>12 (Whereupon, a short recess was taken.)</p> <p>13 THE VIDEOGRAPHER: We are now back on the</p> <p>14 record. The time is 14:15 UTC Time.</p> <p>15 Q. Mr. Abu Hbda, just before we took this</p> <p>16 short break, I was about to tell you that in the</p> <p>17 event that, you know, I will be taking periodic</p> <p>18 breaks during the deposition, and I understand that</p> <p>19 you will need breaks, and I understand from your</p> <p>20 counsel that you will need periodic breaks, just let</p> <p>21 me know, or let Ms. Kropf know, and we will do that.</p> <p>22 I just ask that if there's a pending question, that</p> <p>23 you will not take a break before you answer the</p> <p>24 question; is that okay?</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 15</p> <p>1 A. ABU HBDA</p> <p>2 it, I think we should have all the answers</p> <p>3 translated; it's going to go more smoothly.</p> <p>4 MS. KROPP: That's fine. So, Awni, you</p> <p>5 can have the answers translated to English and,</p> <p>6 then you can answer in Arabic; okay?</p> <p>7 A. I prefer speaking in Arabic.</p> <p>8 Q. Okay.</p> <p>9 MR. BERGER: Excuse me, I have a question.</p> <p>10 This is Mitchell Berger. Is the translator</p> <p>11 translating from a realtime transcript, because we</p> <p>12 don't have that, or is she translating from notes</p> <p>13 that she is taking, or from what Steve is saying?</p> <p>14 MR. SINAICO: Mitch, are you asking to</p> <p>15 have the realtime because I think we can arrange</p> <p>16 that, if --</p> <p>17 MR. BERGER: We ordered the realtime. It</p> <p>18 hasn't been provided to us.</p> <p>19 MR. SINAICO: Do we have a support person</p> <p>20 from U.S. Legal today, because I'm sure we do.</p> <p>21 MR. BERGER: My question is, is Mess</p> <p>22 translating from the realtime?</p> <p>23 MR. SINAICO: Okay. But my question is,</p> <p>24 if you didn't get the realtime, and we have the</p> <p>25 realtime, we would like you to have it.</p>	<p style="text-align: right;">Page 17</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. Mr. Abu Hbda, are you currently</p> <p>3 under the influence of any medication or other</p> <p>4 substance that might inhibit your ability to</p> <p>5 understand and respond to questions?</p> <p>6 A. Not drugs, but I'm taking medication, yes.</p> <p>7 Q. Okay. And does the medication that you're</p> <p>8 taking, Mr. Abu Hbda, interfere with your ability to</p> <p>9 recall or understand questions?</p> <p>10 A. I don't think so.</p> <p>11 Q. Okay. And the medication that you're</p> <p>12 taking, Mr. Abu Hbda, does it interfere with your</p> <p>13 memory in any way?</p> <p>14 A. I'm not a doctor. I don't know.</p> <p>15 Q. Is it your sense, Mr. Abu Hbda, that</p> <p>16 there's any reason, as you sit here today, that</p> <p>17 you're unable to give your best testimony?</p> <p>18 A. I think I can do my best today.</p> <p>19 Q. Thank you very much. Okay.</p> <p>20 MR. SINAICO: Cosette, could we put up Tab</p> <p>21 14, please?</p> <p>22 MS. VINCENT: Yeah.</p> <p>23 MR. SINAICO: I would like to mark as our</p> <p>24 next exhibit, or our first exhibit, Exhibit 1, a</p> <p>25 three-page document titled, "Subpoena to Testify</p>

Awni Abu Hba
April 07, 2021

18 to 21

<p style="text-align: right;">Page 18</p> <p>1 A. ABU HBDA</p> <p>2 at a Deposition in a Civil Action".</p> <p>3 (Whereupon, Subpoena was marked as Exhibit 1</p> <p>4 for identification, as of April 7th, 2021.)</p> <p>5 Q. Mr. Abu Hbda, do you have Exhibit 1? Are</p> <p>6 you able to see Exhibit 1?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And Mr. Abu Hbda, have you seen</p> <p>9 this document before?</p> <p>10 A. Yes.</p> <p>11 Q. And Mr. Abu Hbda, do you recognize this</p> <p>12 document to be a subpoena calling on you to testify</p> <p>13 in this deposition today?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And Mr. Abu Hbda, you're here today</p> <p>16 testifying pursuant to the Subpoena that we've</p> <p>17 marked as Exhibit 1, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Now, in advance of your deposition</p> <p>20 here today, did you do anything to prepare for the</p> <p>21 deposition?</p> <p>22 A. Yes.</p> <p>23 Q. Can you tell us, Mr. Abu Hbda, what you</p> <p>24 did to prepare for your deposition today.</p> <p>25 A. I saw all the document I have in my -- in</p>	<p style="text-align: right;">Page 20</p> <p>1 A. ABU HBDA</p> <p>2 with Ms. Kropf over the telephone in anticipation of</p> <p>3 your deposition?</p> <p>4 A. More than -- more than once, but I don't</p> <p>5 recall how many times.</p> <p>6 Q. Do you think it was more than five times?</p> <p>7 A. No; less.</p> <p>8 Q. Do you remember when the first time was</p> <p>9 that you spoke with Ms. Kropf, in anticipation of</p> <p>10 your deposition?</p> <p>11 MS. KROPP: I object. I mean, I think</p> <p>12 we're -- you asked if he talked to me. You asked</p> <p>13 what he did to prepare. When he first talked to</p> <p>14 me is not a relevant or a proper question here.</p> <p>15 MR. SINAIKO: You may answer.</p> <p>16 MS. KROPP: No.</p> <p>17 Mr. Abu Hbda, I instruct you not to</p> <p>18 answer.</p> <p>19 MR. SINAIKO: What's the basis for</p> <p>20 instructing him not answer when he spoke to you?</p> <p>21 MS. KROPP: Because it gets into</p> <p>22 attorney-client privilege communications, when he</p> <p>23 spoke to --</p> <p>24 MR. SINAIKO: I'm probing his answer. I'm</p> <p>25 entitled to ask how he spoke to you for the</p>
<p style="text-align: right;">Page 19</p> <p>1 A. ABU HBDA</p> <p>2 the office -- in my office.</p> <p>3 Q. Can you tell us what documents you looked</p> <p>4 at? To be more precise -- well, let me withdraw</p> <p>5 that.</p> <p>6 Can you tell us what the documents were</p> <p>7 that you looked at more specifically?</p> <p>8 A. Okay. The paper I do for the -- for</p> <p>9 the -- for my -- for my client, I sent to the --</p> <p>10 THE INTERPRETER: I'm sorry. I will ask</p> <p>11 him to repeat, because I didn't really understand.</p> <p>12 A. I checked -- I checked -- I checked the</p> <p>13 paper I used to -- I sent to the -- to my client, I</p> <p>14 used to send to the Embassy.</p> <p>15 Q. And were those papers for your notary</p> <p>16 public business, sir?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. In anticipation of your deposition</p> <p>19 today, Mr. Abu Hbda, did you meet with anybody?</p> <p>20 A. No.</p> <p>21 Q. Okay. So, did you meet with Ms. Kropf,</p> <p>22 your lawyer, in anticipation of the deposition</p> <p>23 today?</p> <p>24 A. I talked to her over the phone.</p> <p>25 Q. Okay. And how many times did you speak</p>	<p style="text-align: right;">Page 21</p> <p>1 A. ABU HBDA</p> <p>2 deposition today.</p> <p>3 MS. KROPP: And he answered. He spoke to</p> <p>4 me by phone and looked at the records. Any other</p> <p>5 questions is attorney-client privilege.</p> <p>6 MR. SINAIKO: That's an improper</p> <p>7 instruction. We'll have to go about that --</p> <p>8 MS. KROPP: Don't answer that question.</p> <p>9 Q. Aside from talking to Ms. Kropf, did you</p> <p>10 speak to anybody else in anticipation of your</p> <p>11 deposition?</p> <p>12 A. No.</p> <p>13 Q. By the way, when you spoke to Ms. Kropf in</p> <p>14 anticipation of your deposition, did those</p> <p>15 conversations take place in English?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. At any time before your deposition</p> <p>18 today, have you spoken to Mitchell Berger, who is</p> <p>19 attorney for the Defendants, and is on our</p> <p>20 videoconference today?</p> <p>21 A. No.</p> <p>22 Q. At any time before your deposition today,</p> <p>23 have you spoken with Mr. Gassan Baloul, who is also</p> <p>24 an attorney for the Defendants, and who is also on</p> <p>25 our videoconference today?</p>

<p style="text-align: right;">Page 22</p> <p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 Q. Okay. In advance of your deposition</p> <p>4 today, have you spoken with any lawyer associated</p> <p>5 with the law firm Squire, Patton, Boggs, who are</p> <p>6 Counsel for the Defendants in this action?</p> <p>7 A. No.</p> <p>8 Q. Okay. And your lawyer, Ms. Kropf, how did</p> <p>9 you --</p> <p>10 Before you received the Subpoena that</p> <p>11 we've marked as Exhibit 1, have you ever met or</p> <p>12 spoken to Ms. Kropf?</p> <p>13 MS. KROPP: Objection.</p> <p>14 And Mr. Abu Hbda, you do not need to</p> <p>15 answer that question.</p> <p>16 MR. SINAIKO: That is not a proper</p> <p>17 objection. Come on. I'm entitled to know when he</p> <p>18 spoke to you. I'm not asking for the substance of</p> <p>19 the communications. I'm just asking whether there</p> <p>20 were any, because --</p> <p>21 MS. KROPP: No, because it would have</p> <p>22 nothing to do with before he received the</p> <p>23 Subpoena, nothing to do with this case, in</p> <p>24 connection with this matter, and that's an</p> <p>25 improper question. You could take it up with the</p>	<p style="text-align: right;">Page 24</p> <p>1 A. ABU HBDA</p> <p>2 MS. KROPP: Why don't you answer the</p> <p>3 question?</p> <p>4 MR. SINAIKO: Can the reporter please</p> <p>5 repeat the question?</p> <p>6 (Whereupon, the requested portion was read</p> <p>7 back by the reporter.)</p> <p>8 A. Yes. Ms. Kropf. No.</p> <p>9 Q. Okay. And how did you come to be</p> <p>10 introduced to Ms. Kropf?</p> <p>11 A. Through the --</p> <p>12 THE INTERPRETER: I'm sorry.</p> <p>13 A. Through the Internet.</p> <p>14 Q. Mr. Abu Hbda, is it the case that you</p> <p>15 located Ms. Kropf and hired her as your lawyer on</p> <p>16 your own?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And are you paying Ms. Kropf out of</p> <p>19 your own funds, sir?</p> <p>20 MS. KROPP: Objection.</p> <p>21 Q. You may answer.</p> <p>22 MS. KROPP: No, he's not going to answer</p> <p>23 that, Steve. It's not relevant. It gets into the</p> <p>24 attorney-client.</p> <p>25 MR. SINAIKO: Relevance is not a basis for</p>
<p style="text-align: right;">Page 23</p> <p>1 A. ABU HBDA</p> <p>2 Judge.</p> <p>3 MR. SINAIKO: I don't want this to be a</p> <p>4 contentious deposition. The question is not a</p> <p>5 privilege question. Relevance objections are not</p> <p>6 an appropriate basis to instruct a witness not to</p> <p>7 answer. The Witness should answer the question.</p> <p>8 MS. KROPP: You're asking --</p> <p>9 MR. SINAIKO: Are you instructing him not</p> <p>10 to answer based on relevance?</p> <p>11 MS. KROPP: Are you asking him whether or</p> <p>12 not he has spoken to me, an attorney, before he</p> <p>13 received the Subpoena?</p> <p>14 MR. SINAIKO: That's exactly what I'm</p> <p>15 asking. Did he have any contact with you, in</p> <p>16 advance of receiving the Subpoena; that's what I'm</p> <p>17 asking.</p> <p>18 MS. KROPP: As long as you limit your</p> <p>19 answer to that.</p> <p>20 I think we're getting into dangerous</p> <p>21 territory, whether or not he worked with me</p> <p>22 before, or whether or not he'd spoken to me before</p> <p>23 is really not relevant.</p> <p>24 MR. SINAIKO: I'm feeling pretty safe, so</p> <p>25 the Witness can answer the question.</p>	<p style="text-align: right;">Page 25</p> <p>1 A. ABU HBDA</p> <p>2 an instruction not to answer, and the questions as</p> <p>3 to issuance and payments of bills is absolutely</p> <p>4 not privileged. I'm not asking for any</p> <p>5 communications between you and he. I asked for</p> <p>6 the arrangement between you and he, with respect</p> <p>7 to payment of bills, and whether he's paying them;</p> <p>8 that is not a privilege question.</p> <p>9 MS. KROPP: Your arrangement --</p> <p>10 MR. SINAIKO: If you're going to instruct</p> <p>11 him on things like that, we're going to have to go</p> <p>12 to the Judge, which I'd rather not do.</p> <p>13 MS. KROPP: The arrangement we have is in</p> <p>14 writing. It's a communication between us.</p> <p>15 I instruct you not to answer.</p> <p>16 If you want to call the Judge, I invite</p> <p>17 you to do so. It goes to the attorney-client</p> <p>18 privilege written engagement letter, and I'm</p> <p>19 instructing him not to answer.</p> <p>20 MR. SINAIKO: The relationship of his with</p> <p>21 you is not privileged. The communications with</p> <p>22 you is privileged. Let me see if I could put --</p> <p>23 slightly ask the question. I don't want to have</p> <p>24 to go to the Judge, and this is going to take</p> <p>25 longer.</p>

<p style="text-align: right;">Page 26</p> <p>1 A. ABU HBDA</p> <p>2 Q. Mr. Abu Hbda, are you personally paying</p> <p>3 the bills that Ms. Kropf issues for her services in</p> <p>4 connection with this matter?</p> <p>5 MS. KROPP: And I object, and I am</p> <p>6 instructing him not to answer. If you want to</p> <p>7 call the Court, Steve, then let's go ahead and</p> <p>8 stop, and why don't we go ahead and take care of</p> <p>9 it.</p> <p>10 MR. SINAICO: I mean, really, this is</p> <p>11 improper. We're going to put a pin in it, and</p> <p>12 we're going to come back to it, if we have to.</p> <p>13 This is not a proper objection. If we have to go</p> <p>14 to the Judge, or go to Mr. Abu Hbda, you know,</p> <p>15 because of this kind of thing, I would hate to do</p> <p>16 it, but we will have to, if we will. Okay.</p> <p>17 Q. Okay. You mentioned before, Mr. Abu Hbda,</p> <p>18 you reviewed certain documents in anticipation of</p> <p>19 your deposition. Do you remember more specifically</p> <p>20 what those documents were?</p> <p>21 A. Okay. Power of Attorney for my client.</p> <p>22 Q. And what is the nature of these Powers of</p> <p>23 Attorney that you mentioned?</p> <p>24 A. Services for -- for the people from my --</p> <p>25 from my back home, from my community.</p>	<p style="text-align: right;">Page 28</p> <p>1 A. ABU HBDA</p> <p>2 2.</p> <p>3 (Whereupon, Tab 1 was marked as Exhibit 2 for</p> <p>4 identification, as of April 7th, 2021.)</p> <p>5 THE INTERPRETER: Excuse me, can we go off</p> <p>6 record? Can I ask you if we could go off record?</p> <p>7 It's now --</p> <p>8 MR. SINAICO: Sure. If we need to go off</p> <p>9 the record for a moment, we could do that.</p> <p>10 THE INTERPRETER: Yeah. Can I talk to</p> <p>11 you?</p> <p>12 THE VIDEOGRAPHER: Okay. Does everyone</p> <p>13 agree to go off the record?</p> <p>14 MS. KROPP: Yup.</p> <p>15 THE VIDEOGRAPHER: Okay. We are now off</p> <p>16 the record. The time is 14:40 UTC Time.</p> <p>17 (Whereupon, a short recess was taken.)</p> <p>18 THE VIDEOGRAPHER: We are now back on the</p> <p>19 record. The time is 14:45 UTC Time.</p> <p>20 Q. Mr. Abu Hbda, can you see Exhibit 2?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And do you recognize this document?</p> <p>23 And by the way, if you want to page through it, we</p> <p>24 can page through it.</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. ABU HBDA</p> <p>2 Q. You mean your community here in the United</p> <p>3 States?</p> <p>4 A. Yes.</p> <p>5 Q. And are these Powers of Attorney with</p> <p>6 respect to business dealings outside the United</p> <p>7 States?</p> <p>8 THE INTERPRETER: Excuse me, could you</p> <p>9 please repeat?</p> <p>10 MR. SINAICO: Sure. Let me put the</p> <p>11 question a second time.</p> <p>12 Q. Are these Powers of Attorney you</p> <p>13 mentioned, Mr. Abu Hbda, with respect to matters</p> <p>14 outside the United States?</p> <p>15 A. They were special -- they were cases</p> <p>16 special for my client.</p> <p>17 Q. Okay.</p> <p>18 MR. SINAICO: Okay. Cosette, could we</p> <p>19 bring up Tab 1, please?</p> <p>20 MS. VINCENT: Yeah.</p> <p>21 MR. SINAICO: Let's mark Tab 1, the</p> <p>22 document, you know -- let's mark that as our next</p> <p>23 exhibit, Exhibit 2, a six-page document that we</p> <p>24 printed from a Website titled,</p> <p>25 "Palestiniandocs.com"; let's mark that as Exhibit</p>	<p style="text-align: right;">Page 29</p> <p>1 A. ABU HBDA</p> <p>2 Q. And just to be clear, Mr. Abu Hbda, you</p> <p>3 recognize the document; is that correct?</p> <p>4 A. Yes.</p> <p>5 Q. And what do you recognize this document to</p> <p>6 be, Exhibit 2?</p> <p>7 A. It's from the Website, from my computer --</p> <p>8 from the computer.</p> <p>9 Q. And this Website is a website that is --</p> <p>10 well, let me withdraw that.</p> <p>11 Is this Website something that you</p> <p>12 created, or that was created under your direction,</p> <p>13 sir?</p> <p>14 A. Yes, for me.</p> <p>15 Q. And what is the purpose of the Website</p> <p>16 from which we drew Exhibit 2?</p> <p>17 A. Advertising. Advertisement.</p> <p>18 Q. And let's turn to -- actually, hang on one</p> <p>19 second. I want to page through the document.</p> <p>20 MR. SINAICO: Cosette, could you turn us</p> <p>21 to the last page of the document, please?</p> <p>22 Q. Okay. I'm looking. Do you see the last</p> <p>23 box on the page of the document of Exhibit 2?</p> <p>24 A. Now, I can see it.</p> <p>25 Q. Okay. And you see that it says, "Awni Abu</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. ABU HBDA</p> <p>2 Hbda Documentation Services"; do you see that?</p> <p>3 A. Yes. Yes.</p> <p>4 Q. And is that the name of your business,</p> <p>5 sir?</p> <p>6 A. It's part of my business, yes.</p> <p>7 Q. Okay. And is Awni Abu Hbda Documentation</p> <p>8 Services organized as a corporation, or some other</p> <p>9 sort of legal entity?</p> <p>10 A. It's a -- only my own. It's for my --</p> <p>11 yeah, mine person.</p> <p>12 Q. Okay. So, is it organized as a</p> <p>13 corporation, or a limited liability company, or</p> <p>14 anything like that?</p> <p>15 A. No. No.</p> <p>16 Q. Okay. And so would it be fair to say that</p> <p>17 Awni Abu Hbda Documentation Services is a business</p> <p>18 name that you use yourself, sir?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. When did you start Awni Abu Hbda</p> <p>21 Documentation Services?</p> <p>22 A. I don't recall; maybe a year, or a year</p> <p>23 and a half.</p> <p>24 Q. So, you think, sir, that the business was</p> <p>25 funded in 2019 or 2020; is that correct?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. Let's step back just half a step</p> <p>3 here, Mr. Abu Hbda.</p> <p>4 Could you please tell me your educational</p> <p>5 history, since you graduated high school?</p> <p>6 A. Paterson. So --</p> <p>7 THE INTERPRETER: Sorry.</p> <p>8 A. So, I took courses in community college in</p> <p>9 Paterson, but I didn't finish, and so I took some --</p> <p>10 THE INTERPRETER: Hold on, sorry --</p> <p>11 A. Yes, and I took some lecture on insurance,</p> <p>12 and I had my license. I had my license.</p> <p>13 MR. SINAIKO: Okay. Let's take just a</p> <p>14 half a step backwards.</p> <p>15 Actually, Cosette, could you bring up Tab</p> <p>16 8, please, and let's mark it as Exhibit 3.</p> <p>17 Okay. And so we're marking Exhibit 3, a</p> <p>18 four-page excerpt, which we printed from the same</p> <p>19 Website from which we extracted Exhibit 2.</p> <p>20 (Whereupon, Tab 8 was marked as Exhibit 3 for</p> <p>21 identification, as of April 7th, 2021.)</p> <p>22 MR. SINAIKO: I'll just ask Mr. Abu Hbda</p> <p>23 quickly --</p> <p>24 Q. Do you recognize this to be a page from</p> <p>25 the Website for your business?</p>
<p style="text-align: right;">Page 31</p> <p>1 A. ABU HBDA</p> <p>2 A. The Website maybe, yes.</p> <p>3 Q. Okay. But not the Website, the business</p> <p>4 itself. The business that is Awni Abu Hbda</p> <p>5 Documentation Services, when did you start that</p> <p>6 business?</p> <p>7 A. It wasn't the business.</p> <p>8 THE INTERPRETER: Okay. Okay.</p> <p>9 A. It -- before, it wasn't really a business.</p> <p>10 Before, I was not having paper. Before, I didn't</p> <p>11 have -- I haven't have a Website. I only had the</p> <p>12 Website maybe a year, or a year and a half ago.</p> <p>13 Before, I was doing only, like once week,</p> <p>14 or couple of like -- or couple of times a week. It</p> <p>15 wasn't really a business.</p> <p>16 Q. Okay. What was the nature of the</p> <p>17 activities that you were engaged in, Mr. Abu Hbda,</p> <p>18 that, you know, that you were doing once or twice a</p> <p>19 week, and that, apparently now is Awni Abu Hbda</p> <p>20 Documentation Services?</p> <p>21 A. I -- I am.</p> <p>22 THE INTERPRETER: Hold on. Okay.</p> <p>23 A. I am -- I am a notary public, and</p> <p>24 accountant since 1980, and I was doing insurance</p> <p>25 since 1980.</p>	<p style="text-align: right;">Page 33</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes.</p> <p>3 Q. And this is part of the Website that</p> <p>4 either you created, or which was created under your</p> <p>5 direction; is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Let's turn to the second page. So,</p> <p>8 you see the second and third pages had some text</p> <p>9 that's titled, "Palestinian Traditions and American</p> <p>10 Freedoms Blend Perfectly in Paterson"; do you see</p> <p>11 that?</p> <p>12 A. Yes.</p> <p>13 Q. Is that text that you wrote, sir?</p> <p>14 A. No.</p> <p>15 Q. Okay. Is that text --</p> <p>16 That's text that you got from another</p> <p>17 source; is that right?</p> <p>18 THE INTERPRETER: Okay.</p> <p>19 A. It's another magazine. New Jersey</p> <p>20 magazine write it -- wrote it, not me.</p> <p>21 Q. Do you believe the information presented</p> <p>22 in this text is accurate?</p> <p>23 A. I don't know. They wrote it, not me.</p> <p>24 Q. Okay. But you posted it on your Website,</p> <p>25 correct?</p>

<p style="text-align: right;">Page 34</p> <p>1 A. ABU HBDA</p> <p>2 A. True.</p> <p>3 Q. Okay. Let's look at the first sentence.</p> <p>4 It says here, "Awni Abu Hbda came to the United</p> <p>5 States to improve his English skills"; do you see</p> <p>6 that? We could enlarge it, if that would be</p> <p>7 helpful.</p> <p>8 MR. SINAICO: Cosette, could you zoom in</p> <p>9 for us?</p> <p>10 THE INTERPRETER: Thank you.</p> <p>11 A. Yes, I do.</p> <p>12 Q. Okay. And so that statement is accurate,</p> <p>13 correct?</p> <p>14 A. Maybe it was -- it's 50 years ago.</p> <p>15 Q. Actually, that's -- that takes to the next</p> <p>16 sentence. It's -- looking at the next sentence --</p> <p>17 and I recognize this may have been written sometime</p> <p>18 ago -- it says, "Following in the footsteps of an</p> <p>19 older brother, Awni Abu Hbda, now 68, arrived in</p> <p>20 America in 1971"; do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And that's, in fact, when you arrived in</p> <p>23 America, sir, is that correct?</p> <p>24 A. I think; yes.</p> <p>25 Q. Okay. And the sentence goes on to say</p>	<p style="text-align: right;">Page 36</p> <p>1 A. ABU HBDA</p> <p>2 the Institute of Insurance?</p> <p>3 A. Cars, and real estate property, and</p> <p>4 casualty.</p> <p>5 Q. Were the purposes of these courses to help</p> <p>6 you learn about selling property and casualty</p> <p>7 insurance?</p> <p>8 A. I was learning how to sell insurance.</p> <p>9 Q. Okay. And did you receive any sort of</p> <p>10 degree or certificate from the Institute of</p> <p>11 Insurance?</p> <p>12 A. I have New Jersey license.</p> <p>13 Q. Okay. We'll come back to that in just a</p> <p>14 moment.</p> <p>15 Apart from the Institute of Insurance and</p> <p>16 College in Paterson, have you taken any course at</p> <p>17 any institution in the United States?</p> <p>18 A. No.</p> <p>19 Q. Okay. Now, you mentioned a moment ago</p> <p>20 that you are a notary public; do you recall that?</p> <p>21 A. Yes.</p> <p>22 Q. And in what state are you commissioned a</p> <p>23 notary public?</p> <p>24 A. New Jersey State.</p> <p>25 Q. Okay. And you mentioned that you have</p>
<p style="text-align: right;">Page 35</p> <p>1 A. ABU HBDA</p> <p>2 that you graduated from Birzeit University; is that</p> <p>3 correct?</p> <p>4 A. Well, I -- I went to that school, but I</p> <p>5 never graduated.</p> <p>6 Q. Okay. And so you never received a degree</p> <p>7 from Birzeit University; is that correct?</p> <p>8 A. No.</p> <p>9 Q. Have you ever received any degree from any</p> <p>10 university?</p> <p>11 A. No. No.</p> <p>12 Q. Do you have a high school degree, sir?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And you mentioned that you</p> <p>15 attended -- in the United States, you attended some</p> <p>16 classes at a community college at Paterson, New</p> <p>17 Jersey; do you recall that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Apart from the community college in</p> <p>20 Paterson, New Jersey, have you ever taken classes at</p> <p>21 any other educational institution in the United</p> <p>22 States?</p> <p>23 A. Okay. Institute of Insurance for houses,</p> <p>24 car, and life.</p> <p>25 Q. And what sorts of classes did you take at</p>	<p style="text-align: right;">Page 37</p> <p>1 A. ABU HBDA</p> <p>2 some sort of an insurance license; do you recall</p> <p>3 that?</p> <p>4 A. I used --</p> <p>5 THE INTERPRETER: Okay.</p> <p>6 A. I used to have; not now.</p> <p>7 Q. Okay. And when did you get the insurance</p> <p>8 license?</p> <p>9 A. I don't recall, but I think 1980.</p> <p>10 Q. And you don't currently have the license,</p> <p>11 correct?</p> <p>12 A. No.</p> <p>13 Q. When did the license expire?</p> <p>14 A. I don't recall; maybe 1995, '96. I don't</p> <p>15 recall.</p> <p>16 Q. Apart from the insurance license, and the</p> <p>17 Notary Public Commission that you hold from the</p> <p>18 State of New Jersey, do you hold any other licenses</p> <p>19 or certificates from any government authority, you</p> <p>20 know, other than the State of New Jersey, anywhere</p> <p>21 in the world?</p> <p>22 A. No.</p> <p>23 MR. SINAICO: Okay. Let's -- if we could,</p> <p>24 Cosette, could you take us back to the first page</p> <p>25 of Exhibit 3, and let's zoom in at the top of the</p>

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<p style="text-align: right;">Page 38</p> <p>1 A. ABU HBDA</p> <p>2 page. I don't think we have the top of the page.</p> <p>3 We're missing the top of the page. Could you zoom</p> <p>4 in? There you go. Could we zoom in on the</p> <p>5 Internet address?</p> <p>6 Q. Mr. Abu Hbda, do you see that the Internet</p> <p>7 address for the Website that you use for your</p> <p>8 business is, "Palestiniandocs.com"?</p> <p>9 A. Yes.</p> <p>10 THE INTERPRETER: Sorry.</p> <p>11 Q. And is that an Internet name that you</p> <p>12 selected?</p> <p>13 A. Yes.</p> <p>14 Q. How did you come to select that name for</p> <p>15 your business?</p> <p>16 A. It's a business name; nothing else.</p> <p>17 Q. All right. I'm just asking why you chose</p> <p>18 that name.</p> <p>19 A. It's a business name, that's all.</p> <p>20 Q. Was there any particular reason that you</p> <p>21 chose that name, as opposed to some other name?</p> <p>22 A. There is no reason.</p> <p>23 Q. Do you specialize, or does your business</p> <p>24 have a specialty in dealing with Palestinian</p> <p>25 documents?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. ABU HBDA</p> <p>2 THE INTERPRETER: Okay. Okay.</p> <p>3 A. I'm a notary public who is witness to</p> <p>4 either Palestinian, or somebody else who -- who --</p> <p>5 who witness and sign the paper for everybody, and</p> <p>6 send paper to either the Palestinian Embassy, or</p> <p>7 other embassies.</p> <p>8 Q. Okay. So, one of the -- sir --</p> <p>9 Is it fair to say, sir, that one of the</p> <p>10 services that you offer through your business is the</p> <p>11 submission of documents on behalf of your clients,</p> <p>12 to the Palestinian Authority?</p> <p>13 THE INTERPRETER: Okay. Okay.</p> <p>14 A. No, I only send it to the Embassy if --</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. I don't send -- usually, I -- I don't --</p> <p>17 usually, I don't send the paper to the Embassy. I</p> <p>18 only send the paper if -- if the person ask me. I</p> <p>19 don't know how to send to the Embassy. Usually, I</p> <p>20 don't do it.</p> <p>21 Q. Okay. So, one of the --</p> <p>22 Is it fair to say, sir, that one of the</p> <p>23 services --</p> <p>24 MR. BERGER: Excuse me, I'm going to</p> <p>25 object to the translation. We all heard the</p>
<p style="text-align: right;">Page 39</p> <p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 Q. In your business, do you frequently deal</p> <p>4 with documents that are either being submitted to,</p> <p>5 or being issued by the Palestinian government --</p> <p>6 actually, I withdraw the question. Let me ask the</p> <p>7 question again.</p> <p>8 Do you specialize, or does your business</p> <p>9 have a specialty, in dealing with documents issued</p> <p>10 by the Palestinian Authority?</p> <p>11 A. No.</p> <p>12 Q. In your business, do you frequently deal</p> <p>13 with documents that are being submitted to or were</p> <p>14 issued by the Palestinian Authority?</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. I -- I -- I witness -- I witness notary</p> <p>17 public to everybody.</p> <p>18 THE INTERPRETER: I'm sorry.</p> <p>19 A. Everyone, from everywhere -- from --</p> <p>20 from -- I witness notary public for everybody from</p> <p>21 everywhere around the world.</p> <p>22 Q. Okay. Do you deal --</p> <p>23 In your business, sir, do you deal with</p> <p>24 documents that are being submitted to the</p> <p>25 Palestinian Authority?</p>	<p style="text-align: right;">Page 41</p> <p>1 A. ABU HBDA</p> <p>2 answer in English. The translation has generally</p> <p>3 been terrible. We heard the answer in English.</p> <p>4 It's on the videotape. The word, "usual," was</p> <p>5 never used.</p> <p>6 MR. SINAIKO: I'm going to say, Mr. Abu</p> <p>7 Hbda requested a translator today. I assume he</p> <p>8 took the position that his English is not able to</p> <p>9 testify today. Mr. Abu Hbda's English is pretty</p> <p>10 good. He seems to understand my questions well.</p> <p>11 He often starts to answer them before the</p> <p>12 translator has finished translating, and my</p> <p>13 question is, why did we go -- I mean, if Abu Hbda</p> <p>14 is able to answer questions in English, why do we</p> <p>15 have a translator here today? That's a question</p> <p>16 for Ms. Kropf.</p> <p>17 MS. KROPP: If you recall, Steve, we</p> <p>18 started the deposition by saying why doesn't he</p> <p>19 answer the questions in English, and he translated</p> <p>20 the answer, and we started with that process, and</p> <p>21 you said it was smoother to have him answer, and</p> <p>22 have her translate in English.</p> <p>23 My suggestion is, why don't I talk to</p> <p>24 Mr. Abu Hbda, and see how it's going, and see this</p> <p>25 process before, and see how it's working.</p>

<p style="text-align: right;">Page 42</p> <p>1 A. ABU HBDA</p> <p>2 I take your point. It's your deposition.</p> <p>3 We suggested the translator in case there were any</p> <p>4 issues, but my suggestion was that he answered in</p> <p>5 English. I thought you said it was smoother if he</p> <p>6 answered in Arabic.</p> <p>7 MR. SINAICO: Actually, I -- the court</p> <p>8 reporter explained, and I agree, there has to be a</p> <p>9 consistent way that we're doing this. It's not</p> <p>10 possible for us to rely on translations of the</p> <p>11 questions, and answers in English. Like, either</p> <p>12 it's a translated deposition, or it's not a</p> <p>13 translated deposition.</p> <p>14 And if we're going to have him testify in</p> <p>15 English, which I, actually, having now watched</p> <p>16 this unfold for a while now, because I'm sort of</p> <p>17 learning a little bit myself about Mr. Abu Hbda's</p> <p>18 English skills, it seems to me that he understands</p> <p>19 pretty well, and, you know, given his background,</p> <p>20 he's been in the United States for 50 years, it's</p> <p>21 not surprising that he understands pretty well.</p> <p>22 If you want to take a break, that's fine,</p> <p>23 and if you want to make sure it makes sense to</p> <p>24 continue with the translator, or whether we ought</p> <p>25 to -- ought to excuse the translator and continue</p>	<p style="text-align: right;">Page 44</p> <p>1 A. ABU HBDA</p> <p>2 He's saying something in Arabic, and he</p> <p>3 was saying something in English, and I have to say</p> <p>4 both, so that's why I was translating both; that's</p> <p>5 what I did.</p> <p>6 MR. SINAICO: Understood. That's actually</p> <p>7 one of the things that we have to work out here,</p> <p>8 whether it makes sense to have the translated</p> <p>9 deposition, whether Mr. Abu Hbda's skills -- it's</p> <p>10 more sensible, and more efficient to just proceed</p> <p>11 in English. So, why don't we go off the record.</p> <p>12 We'll resume at 11:35, and we'll figure out how to</p> <p>13 handle this.</p> <p>14 THE VIDEOGRAPHER: Okay. We're now off</p> <p>15 the record. The time is 15:22 UTC Time.</p> <p>16 (Whereupon, a short recess was taken.)</p> <p>17 THE VIDEOGRAPHER: We are now back on the</p> <p>18 record. The time is 15:39 UTC Time.</p> <p>19 MR. SINAICO: So, before we resume the</p> <p>20 examination of Mr. Abu Hbda, I just want to</p> <p>21 summarize the conversation that Ms. Kropf and I</p> <p>22 had off the record, which is that, although</p> <p>23 Mr. Abu Hbda's English skills are pretty good,</p> <p>24 Ms. Kropf informed me that Mr. Abu Hbda is more</p> <p>25 comfortable having a translator on the call for</p>
<p style="text-align: right;">Page 43</p> <p>1 A. ABU HBDA</p> <p>2 the deposition after the break in English only.</p> <p>3 MS. KROPP: I would like to talk to my</p> <p>4 client about that because there's a comfort point</p> <p>5 here, you know -- because you're going to ask</p> <p>6 questions that are probably technical. The words</p> <p>7 are very much going to matter, and I don't know</p> <p>8 how he feels about the translation. So, why don't</p> <p>9 we take a 15-minute break, and I'll talk to him,</p> <p>10 and if you want to, you know, the counsel can talk</p> <p>11 offline as well.</p> <p>12 MR. SINAICO: Sure. So, it's 11:21 now,</p> <p>13 according to my clock. Why don't we plan to</p> <p>14 resume ourselves at -- you want to resume at</p> <p>15 11:45?</p> <p>16 MS. KROPP: I don't know if we need that</p> <p>17 long.</p> <p>18 MR. SINAICO: We don't need that much</p> <p>19 time.</p> <p>20 MS. KROPP: I think 15 minutes is 11:35.</p> <p>21 MR. SINAICO: That's perfect. Why don't</p> <p>22 we go off the record and resume at 11:35.</p> <p>23 THE VIDEOGRAPHER: We're off the record --</p> <p>24 THE INTERPRETER: I want to say something</p> <p>25 in English, and this is --</p>	<p style="text-align: right;">Page 45</p> <p>1 A. ABU HBDA</p> <p>2 which reason, we're going to, at least for the</p> <p>3 time being, continue using the translator, and we</p> <p>4 could continue to reevaluate that as we move</p> <p>5 forward; is that fair, Ms. Kropf?</p> <p>6 MS. KROPP: That's correct. Thanks,</p> <p>7 Steve.</p> <p>8 MR. SINAICO: Okay.</p> <p>9 Q. I think we were looking at --</p> <p>10 MR. SINAICO: Okay. Let's go back to</p> <p>11 Exhibit 3.</p> <p>12 And Cosette, could we go to Page 2,</p> <p>13 please? And could we zoom in on the one, two --</p> <p>14 third paragraph.</p> <p>15 Q. All right. Mr. Abu Hbda, can you see the</p> <p>16 third paragraph of that text that's, you know, part</p> <p>17 of the Exhibit 3?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And I'm looking at the second --</p> <p>20 the second sentence of Paragraph 3. It says that</p> <p>21 you studied business and political science at</p> <p>22 Passaic County Community College, and William</p> <p>23 Paterson Community College; is that correct?</p> <p>24 A. It's just some --</p> <p>25 MR. SINAICO: I'm just going to note for</p>

<p style="text-align: right;">Page 46</p> <p>1 A. ABU HBDA</p> <p>2 the record that, you know, in response to my</p> <p>3 question, Mr. Abu Hbda immediately began answering</p> <p>4 in English, and his answer was perfectly</p> <p>5 intelligible to me, but we should continue with</p> <p>6 the translation.</p> <p>7 A. Yeah.</p> <p>8 Q. Sir, is it accurate that you took business</p> <p>9 and political science classes at Passaic County</p> <p>10 Community College?</p> <p>11 A. Yes.</p> <p>12 Q. And is that the community college in</p> <p>13 Paterson, New Jersey that you mentioned earlier in</p> <p>14 your testimony today, sir?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And William Paterson University,</p> <p>17 that's not the college that you mentioned earlier;</p> <p>18 is that right?</p> <p>19 A. No.</p> <p>20 Q. Okay. But you did take classes at William</p> <p>21 Paterson University, in addition to the college in</p> <p>22 Paterson, New Jersey, and in addition to the</p> <p>23 Institution of Insurance, correct?</p> <p>24 A. In William Paterson, and I -- I took --</p> <p>25 it's -- I took a couple of lecture with -- for</p>	<p style="text-align: right;">Page 48</p> <p>1 A. ABU HBDA</p> <p>2 lost"; do you see that?</p> <p>3 THE INTERPRETER: Counselor, I don't see</p> <p>4 it.</p> <p>5 MR. SINAIKO: Sure. We're in the second</p> <p>6 paragraph on the page. There's a one-line</p> <p>7 paragraph, and a second paragraph, and we're</p> <p>8 looking at the second sentence, which says, "Awni</p> <p>9 Abu Hbda made a run for the City Council in 1984</p> <p>10 but lost."</p> <p>11 THE INTERPRETER: Yes. Okay.</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And is that statement accurate?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And let me just go to -- let me go</p> <p>16 to the fourth paragraph down, the one that starts,</p> <p>17 "Today political candidates," and the first line of</p> <p>18 the paragraph, second sentence says, "In addition to</p> <p>19 servicing as Paterson's Deputy Mayor"; do you see</p> <p>20 that.</p> <p>21 MR. SINAIKO: The first sentence says, "In</p> <p>22 addition to," -- the second sentence says, "In</p> <p>23 addition to servicing as Paterson Deputy Mayor."</p> <p>24 THE INTERPRETER: Thank you.</p> <p>25 MR. SINAIKO: We're actually focusing on</p>
<p style="text-align: right;">Page 47</p> <p>1 A. ABU HBDA</p> <p>2 insurance, not credits.</p> <p>3 Q. Okay. Now that we've clarified that you</p> <p>4 took classes at William Paterson University, in</p> <p>5 addition to the Institute of Insurance, and the</p> <p>6 College at William Paterson, does that refresh your</p> <p>7 recollection of any other institution in the United</p> <p>8 States where you studied?</p> <p>9 THE INTERPRETER: Can you repeat that?</p> <p>10 MR. SINAIKO: Can the court reporter read</p> <p>11 back the question, please?</p> <p>12 (Whereupon, the requested portion was read</p> <p>13 back by the reporter.)</p> <p>14 A. I don't recall.</p> <p>15 Q. Okay.</p> <p>16 THE VIDEOGRAPHER: Can I just ask Mr. Abu</p> <p>17 Hbda to keep his face in the screen? Your mouth</p> <p>18 is cut off. Thank you. Thank you.</p> <p>19 MR. SINAIKO: Let's go to the next page of</p> <p>20 Exhibit 3. And can we zero in on the second</p> <p>21 paragraph at the top? There's the one-liner, and</p> <p>22 then there's the second paragraph.</p> <p>23 Q. All right. Mr. Abu Hbda, do you see that</p> <p>24 in the second paragraph, the Article says, "Awni Abu</p> <p>25 Hbda made a run for the City Counsel in 1984 but</p>	<p style="text-align: right;">Page 49</p> <p>1 A. ABU HBDA</p> <p>2 the next sentence, actually --</p> <p>3 Q. Actually, let me withdraw the question.</p> <p>4 Now that the translating is focusing on</p> <p>5 what I'm focusing on, let me just put the question</p> <p>6 again.</p> <p>7 A. Yes.</p> <p>8 Q. Mr. Abu Hbda, on the second page of</p> <p>9 Exhibit 3, in the fourth paragraph, do you see that</p> <p>10 it says, "In addition to servicing as Paterson's</p> <p>11 Deputy Mayor an additional" --</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Is it, in fact, the case you served</p> <p>14 as Paterson's Deputy Mayor?</p> <p>15 A. Yes.</p> <p>16 Q. And when did you serve as Paterson's</p> <p>17 Deputy Mayor?</p> <p>18 A. 2002 to 2010.</p> <p>19 Q. Okay. And have you ever held any title,</p> <p>20 or -- well, let me withdraw that.</p> <p>21 Have you ever held any title under any</p> <p>22 other -- under any other government, apart from</p> <p>23 Paterson, New Jersey?</p> <p>24 A. New Jersey -- in Paterson Commissioner,</p> <p>25 but not in New Jersey.</p>

Awni Abu Hba
April 07, 2021

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<p style="text-align: right;">Page 50</p> <p>1 A. ABU HBDA</p> <p>2 Q. I'm sorry, can you --</p> <p>3 A. In Paterson, Commissioner comments --</p> <p>4 Commissioner Institutes of Paterson. Commissioner</p> <p>5 Institutes of Paterson.</p> <p>6 Q. Okay. Mr. Abu Hbda, was your answer a</p> <p>7 moment ago that you also served as some sort of a</p> <p>8 Commissioner in Paterson, New Jersey?</p> <p>9 A. Yes.</p> <p>10 Q. We should wait for the translator to</p> <p>11 answer for you, and then would you answer --</p> <p>12 By the way, let's get through this</p> <p>13 question and we'll come back.</p> <p>14 MR. SINAICO: Could the court reporter</p> <p>15 read back the question, please?</p> <p>16 (Whereupon, the requested portion was read</p> <p>17 back by the reporter.)</p> <p>18 A. I used to be Commissioner of the institute</p> <p>19 of Paterson.</p> <p>20 Q. Sir, is it accurate that you were a --</p> <p>21 that you held the title of Commissioner of the City</p> <p>22 of Paterson, New Jersey -- you were one of the --</p> <p>23 withdrawn.</p> <p>24 Is it accurate, sir, that you held the</p> <p>25 title Commissioner in the City of Paterson, and that</p>	<p style="text-align: right;">Page 52</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay.</p> <p>3 MR. SINAICO: Cosette, let's bring up Tab</p> <p>4 2, please. And I would like to mark this as our</p> <p>5 next exhibit; I think it's going to be Exhibit 4.</p> <p>6 (Whereupon, Tab 2 was marked as Exhibit 4 for</p> <p>7 identification, as of April 7th, 2021.)</p> <p>8 MR. SINAICO: Cosette?</p> <p>9 MS. VINCENT: Yes. Bringing it up.</p> <p>10 MR. SINAICO: Please. Okay. Thank you.</p> <p>11 So, I would like to mark for identification as</p> <p>12 Exhibit 4 a three-page excerpt from Mr. Abu Hbda's</p> <p>13 Website, and --</p> <p>14 Q. And I would ask you, Mr. Abu Hbda, can you</p> <p>15 see the document?</p> <p>16 A. Yes.</p> <p>17 Q. And do you recognize this to be an excerpt</p> <p>18 for the Website that you obtained for your business?</p> <p>19 A. Yes.</p> <p>20 Q. And this page of your Website was prepared</p> <p>21 by you or under your direction, correct?</p> <p>22 A. Yes, I -- I -- yes, I took it, but it</p> <p>23 wasn't me who prepared.</p> <p>24 Q. So, it wasn't you who prepared -- oh, I'm</p> <p>25 sorry. Let me withdraw that.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. ABU HBDA</p> <p>2 you were one of a number of Commissioners in that</p> <p>3 city?</p> <p>4 A. I used to be the Commissioner, the</p> <p>5 Institute of Paterson, and the Library Boards.</p> <p>6 Q. Were those appointed commissions, or --</p> <p>7 withdrawn.</p> <p>8 Were those appointed positions or elected</p> <p>9 positions?</p> <p>10 A. It's appointed.</p> <p>11 Q. Okay. And apart from your positions in</p> <p>12 the City of Paterson as Deputy Mayor, and</p> <p>13 Commissioner, and the Library Board, have you ever</p> <p>14 held any other title with any government body?</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. With the government, no.</p> <p>17 Q. Okay. Have you ever held a title given to</p> <p>18 you by the Palestinian Authority?</p> <p>19 A. No.</p> <p>20 Q. Have you ever been an employee of the</p> <p>21 Palestinian Authority?</p> <p>22 A. No.</p> <p>23 Q. Have you ever held a title given to you by</p> <p>24 the Palestine Liberation Organization?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 53</p> <p>1 A. ABU HBDA</p> <p>2 Just to be clear, Mr. Abu Hbda, your</p> <p>3 testimony is that you didn't prepare the document,</p> <p>4 or you didn't prepare this document, but you checked</p> <p>5 its content and you agreed with its content,</p> <p>6 correct?</p> <p>7 A. Yes, I checked it and I agree on it. I</p> <p>8 agreed on it.</p> <p>9 MR. SINAICO: Okay. Let's turn to Page 2</p> <p>10 of the document.</p> <p>11 Q. At the top of the page, Mr. Abu Hbda, do</p> <p>12 you see that it says, "Legalize You Documents"?</p> <p>13 THE INTERPRETER: I don't see it.</p> <p>14 MR. SINAICO: At the top of the page, in</p> <p>15 the center, "Legalize You Documents"?</p> <p>16 THE INTERPRETER: Oh, yeah. Okay.</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And can you explain to us -- well,</p> <p>19 withdrawn.</p> <p>20 Is Legal -- is, "Legalize You Documents,"</p> <p>21 is that a service that you provide through Abu Hbda</p> <p>22 Documentation Services?</p> <p>23 A. Yes.</p> <p>24 Q. And can you describe to us what that</p> <p>25 service is exactly? When you say that one of the</p>

<p style="text-align: right;">Page 54</p> <p>1 A. ABU HBDA</p> <p>2 services you offer is, "Legalize You Documents,"</p> <p>3 what do you mean by that?</p> <p>4 A. I witness -- I witness -- I witness,</p> <p>5 and -- and notary -- about the paper of my client</p> <p>6 for the embassy, for the embassies.</p> <p>7 Q. Okay. And that -- and which embassies are</p> <p>8 those, sir?</p> <p>9 A. Any embassies in the world.</p> <p>10 Q. Does that include, in any way, any</p> <p>11 embassies with the Palestinian Authority?</p> <p>12 THE INTERPRETER: Could you please repeat,</p> <p>13 sorry? Excuse me.</p> <p>14 MR. SINAICO: Could the reporter please</p> <p>15 read back the question?</p> <p>16 (Whereupon, the requested portion was read</p> <p>17 back by the reporter.)</p> <p>18 Q. When you mentioned, Mr. Abu Hbda, any</p> <p>19 embassies in the world, does that include any</p> <p>20 embassies that are in any way associated with the</p> <p>21 Palestinian Authority?</p> <p>22 A. For the Palestinian Embassy will ask</p> <p>23 people to send their paper to the Embassy.</p> <p>24 Q. Okay. So, to go back to the question, the</p> <p>25 answer is, I think what you were saying, sir, is</p>	<p style="text-align: right;">Page 56</p> <p>1 A. ABU HBDA</p> <p>2 skills are obviously less, you know -- less sharp</p> <p>3 than those of your check translator. In any</p> <p>4 event, let me just try to put this question again.</p> <p>5 Q. When you say, Mr. -- when you say,</p> <p>6 Mr. Abu Hbda that -- let me -- let me withdraw that</p> <p>7 question.</p> <p>8 Going back to the top of the center of</p> <p>9 Page 2 of Exhibit 4 where it says, "Legalize You</p> <p>10 Documents," is it correct, sir, that the service of,</p> <p>11 "Legalize You Documents," involves witnessing and</p> <p>12 notarizing new signatures on documents?</p> <p>13 THE INTERPRETER: Okay.</p> <p>14 A. Most of the time, yes. Sometimes there is</p> <p>15 no signature.</p> <p>16 Q. Okay. And when there is no signature,</p> <p>17 what does the process of Legalize You Document</p> <p>18 involve?</p> <p>19 THE INTERPRETER: Okay.</p> <p>20 A. So, when there is --</p> <p>21 THE INTERPRETER: Hold on. One.</p> <p>22 A. When there is a certificate, a course</p> <p>23 certificate, or a Ph.D., or a death certificate, or</p> <p>24 a school certificate, or a divorce, or university</p> <p>25 certificate, we -- we -- we don't sign, we -- we</p>
<p style="text-align: right;">Page 55</p> <p>1 A. ABU HBDA</p> <p>2 that the answer to the question is, yes, that the</p> <p>3 documents in question are prepared for use, you</p> <p>4 know, or submission to embassies affiliated in some</p> <p>5 way with the Palestinian Authority; is that correct?</p> <p>6 MR. BERGER: Objection, that</p> <p>7 mischaracterizes his testimony.</p> <p>8 Q. Okay. You may answer, Mr. Abu Hbda.</p> <p>9 Actually, I apologize. Let me withdraw the</p> <p>10 question.</p> <p>11 You testified a moment ago, Mr. Abu Hbda,</p> <p>12 that you witness documents for the embassies, and I</p> <p>13 asked you whether that -- the embassies included any</p> <p>14 embassies that included in any way any embassies</p> <p>15 associated with the Palestinian Authority?</p> <p>16 MR. BERGER: Objection; that's not what he</p> <p>17 said.</p> <p>18 MR. SINAICO: I'm reading from the</p> <p>19 realtime.</p> <p>20 MR. BERGER: You're using the word, "for,"</p> <p>21 in a way that the translator didn't mean. I could</p> <p>22 tell you that because we have a check translator</p> <p>23 here.</p> <p>24 MR. SINAICO: I see. I can't say what the</p> <p>25 translator knows or doesn't know. My Arabic</p>	<p style="text-align: right;">Page 57</p> <p>1 A. ABU HBDA</p> <p>2 don't sign it. We sign it --</p> <p>3 THE INTERPRETER: Okay.</p> <p>4 A. We sign it, and we send it to --</p> <p>5 THE INTERPRETER: Okay.</p> <p>6 A. Okay. Either people they will send it to</p> <p>7 the Embassy, or we send it to the Embassy.</p> <p>8 Q. Okay. So, that -- the service, "Legalize</p> <p>9 You Documents," as noted at the top of the second</p> <p>10 page of Exhibit 4, can involve you notarizing a</p> <p>11 signature, correct?</p> <p>12 THE INTERPRETER: Okay.</p> <p>13 A. So, when it's most -- yeah; when it's a</p> <p>14 paper coming from the Court, or from a -- when it's</p> <p>15 a legal paper, or it's a degree. So, we -- we</p> <p>16 consider it as a -- it's something legal. So, we</p> <p>17 consider it as something legal.</p> <p>18 Q. Okay. Let me go back to the question,</p> <p>19 Mr. Abu Hbda. The question is, does the service of</p> <p>20 Legalize You Documents noted at the top of the</p> <p>21 center of Page 2, Exhibit 4 include, in some</p> <p>22 instances, notarizing a signature? That's a simple</p> <p>23 question.</p> <p>24 THE INTERPRETER: Hold on. I'm sorry.</p> <p>25 I'm assume to go step by step because I cannot say</p>

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<p style="text-align: right;">Page 58</p> <p>1 A. ABU HBDA</p> <p>2 like that my translation has to be accurate.</p> <p>3 A. Okay. Some legal paper doesn't need to</p> <p>4 be -- doesn't need to be legalized.</p> <p>5 Q. Understood, understood. Let me step back</p> <p>6 for a moment, because we're getting a little off</p> <p>7 track here.</p> <p>8 In some instances, "Legalize You</p> <p>9 Documents," involves notarizing a signature; is that</p> <p>10 correct, sir? This is the service that's noted at</p> <p>11 the top of the page, correct, sir?</p> <p>12 A. If someone has a paper and we have to sign</p> <p>13 on it, yes.</p> <p>14 Q. Okay.</p> <p>15 A. The person has to sign the front of us,</p> <p>16 yes.</p> <p>17 MR. SINAIKO: I would just note again that</p> <p>18 Mr. Abu Hbda answered that question in English</p> <p>19 over the translator and, you know, in a perfectly</p> <p>20 coherent way. We're going to continue with the</p> <p>21 translator now, but I am concerned that this is an</p> <p>22 incredible waste of time, that the translator is</p> <p>23 acting ineffective here, and it's slowing down the</p> <p>24 deposition, but we could then --</p> <p>25 Q. New question. Is it correct that service</p>	<p style="text-align: right;">Page 60</p> <p>1 A. ABU HBDA</p> <p>2 certificate, or a death certificate, in that</p> <p>3 instance, you send the -- if the client asks you to</p> <p>4 you send the certificate to an Embassy -- I think</p> <p>5 you mentioned an Embassy -- and they put a stamp on</p> <p>6 it from a foreign government; is that correct?</p> <p>7 THE INTERPRETER: Could you say it step by</p> <p>8 step.</p> <p>9 MR. SINAIKO: Okay.</p> <p>10 THE INTERPRETER: Or I will read it from</p> <p>11 the transcript.</p> <p>12 Q. Let me try to ask the question in pieces</p> <p>13 slowly.</p> <p>14 When you are dealing -- instances when</p> <p>15 legalizing a document involves legalizing a death</p> <p>16 certificate; is that correct, Mr. Abu Hbda?</p> <p>17 A. Yes. Yes, and they will be free, if they</p> <p>18 want to sign it -- if they will sign it or not.</p> <p>19 Q. Okay. But whether or not the -- whether</p> <p>20 or not the client signs the document,</p> <p>21 legalization -- that -- what does legalization of a</p> <p>22 document like that entail?</p> <p>23 A. The person will go back to the -- to the</p> <p>24 --</p> <p>25 MR. SINAIKO: Once again, I'll note that</p>
<p style="text-align: right;">Page 59</p> <p>1 A. ABU HBDA</p> <p>2 of Legalize You Documents sometimes performs you</p> <p>3 witnessing the signature?</p> <p>4 A. Sometimes, yes, sometimes, no.</p> <p>5 Q. Okay. At times, it does, correct?</p> <p>6 THE INTERPRETER: Excuse me.</p> <p>7 Q. At times, it does, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And at times, "Legalize You</p> <p>10 Documents," involves documents that are not signed</p> <p>11 by your clients; is that correct, sir?</p> <p>12 THE INTERPRETER: I'm sorry, I'm just</p> <p>13 reading the question again.</p> <p>14 Okay.</p> <p>15 A. If it's a legal paper, no. If it's like a</p> <p>16 court, or a divorce, or a death -- death.</p> <p>17 Q. Okay. And in that -- in that instance --</p> <p>18 When we're talking about a document that</p> <p>19 is not signed by your client, is it correct, sir,</p> <p>20 that your service involved submitting that document</p> <p>21 to an authority for authentication or certification?</p> <p>22 A. I would send the paper, and they are free</p> <p>23 to sign it or not, either sign it or nothing.</p> <p>24 Q. Okay. When you're talking about, for</p> <p>25 example, authentication, or legalization of a birth</p>	<p style="text-align: right;">Page 61</p> <p>1 A. ABU HBDA</p> <p>2 Mr. Abu Hbda is assisting the translator, and</p> <p>3 translating, and speaking perfect English.</p> <p>4 A. The person will -- will go back to the --</p> <p>5 to the place where -- the person will -- will go</p> <p>6 back to the place, like whether they will sign it or</p> <p>7 not, the person will go back to the --</p> <p>8 THE INTERPRETER: Okay. Excuse me, I will</p> <p>9 translate it.</p> <p>10 A. The person will take the paper -- the</p> <p>11 person will take the paper.</p> <p>12 THE INTERPRETER: Okay.</p> <p>13 A. He will send it back to his home, back</p> <p>14 home.</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. And the -- the -- his back home is free to</p> <p>17 accept it, whether accept it or not.</p> <p>18 Q. And sometimes, Mr. Abu Hbda, you send the</p> <p>19 document, correct, rather than your client?</p> <p>20 A. If they ask me to do it, yes.</p> <p>21 Q. Okay. And when you send the document,</p> <p>22 what is the purpose of sending the document; what</p> <p>23 are you trying to get?</p> <p>24 A. To be -- to be signed by the -- by the</p> <p>25 embassy, or -- by the embassy or the -- by the</p>

<p style="text-align: right;">Page 62</p> <p>1 A. ABU HBDA</p> <p>2 embassy or the consulate.</p> <p>3 Q. To be signed by an official of a foreign</p> <p>4 government, correct, or stamp -- let me withdraw</p> <p>5 that.</p> <p>6 To be signed, or stamped, or -- let me</p> <p>7 withdraw that. I'm going to try one more time.</p> <p>8 When you send the documents to a foreign</p> <p>9 embassy, the purpose of that is to have them sign</p> <p>10 and/or stamp, or certified by an official of a</p> <p>11 foreign government; is that correct?</p> <p>12 A. They will.</p> <p>13 THE INTERPRETER: Okay.</p> <p>14 A. They will -- they will sign on the top of</p> <p>15 my signature. They're not responsible of the main</p> <p>16 contain of the paper.</p> <p>17 Q. Right. But the purpose of submitting the</p> <p>18 document to the foreign embassy is to obtain a</p> <p>19 signature or a stamp on the document from an</p> <p>20 official of the government whose embassy that is; is</p> <p>21 that correct?</p> <p>22 A. Yes; correct.</p> <p>23 Q. Okay. And one of the places to which you</p> <p>24 submit documents of this nature to get a signature,</p> <p>25 or a certification, or a stamp is the Palestinian</p>	<p style="text-align: right;">Page 64</p> <p>1 A. ABU HBDA</p> <p>2 affiliated with the Palestinian Authority, correct,</p> <p>3 sir?</p> <p>4 A. I only know that it represent -- it</p> <p>5 represent Palestinian, Palestinian people.</p> <p>6 Q. Okay. Staying on Page 2 of Exhibit 4, do</p> <p>7 you see, sir, that it says, "Passport Services"; do</p> <p>8 you see that, sir?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And would it be fair to say, sir,</p> <p>11 that, "Passport Services," involves the submission</p> <p>12 of applications to obtain or renew a passport?</p> <p>13 A. No.</p> <p>14 Q. No? Can you describe -- oh, sorry. Can</p> <p>15 you describe what, "Passport Services," means,</p> <p>16 please?</p> <p>17 A. Someone will come with that --</p> <p>18 THE INTERPRETER: Hold on.</p> <p>19 A. Someone will come --</p> <p>20 THE INTERPRETER: Hold on.</p> <p>21 A. Someone will come --</p> <p>22 THE INTERPRETER: Okay.</p> <p>23 A. Someone will come with his passport. We</p> <p>24 will do Power of Attorney from him to someone else.</p> <p>25 He will sign it in front of me.</p>
<p style="text-align: right;">Page 63</p> <p>1 A. ABU HBDA</p> <p>2 Authority; is that correct?</p> <p>3 A. No.</p> <p>4 Q. So, the answer is no, that's not correct?</p> <p>5 A. I don't send to them -- I don't send to</p> <p>6 the -- the Palestinian Authority. I send to people</p> <p>7 who represent the Palestinian Authority.</p> <p>8 MR. SINAICO: Okay. Once again, I'm going</p> <p>9 to note that Mr. Abu Hbda was assisting the</p> <p>10 translator, and translating his answer into</p> <p>11 English, and I'm going to go on to my next</p> <p>12 question, which is --</p> <p>13 Q. To the embassy which you send these papers</p> <p>14 in Canada, you understand that to be an embassy</p> <p>15 operated by the Palestinian Authority, correct?</p> <p>16 THE INTERPRETER: Can you please repeat</p> <p>17 the question.</p> <p>18 MR. SINAICO: Can the court reporter read</p> <p>19 the question back, please.</p> <p>20 (Whereupon, the requested portion was read</p> <p>21 back by the reporter.)</p> <p>22 A. Yeah, you -- it was -- it was writing</p> <p>23 that -- it was -- it was writing -- no, the title</p> <p>24 was Palestinian delegation.</p> <p>25 Q. Okay. You understand that embassy to be</p>	<p style="text-align: right;">Page 65</p> <p>1 A. ABU HBDA</p> <p>2 After that, I will sign it notary, and I</p> <p>3 will give -- I will give it to him, and he will send</p> <p>4 it to -- he will send it with whatever he wants.</p> <p>5 Q. Okay. So, your service, when you say,</p> <p>6 "Passport Services" -- pardon me.</p> <p>7 When you say, "Passport Services," on your</p> <p>8 Website here, Mr. Abu Hbda, the service you provide</p> <p>9 is notarizing a signature on a passport application;</p> <p>10 is that correct?</p> <p>11 THE INTERPRETER: Okay.</p> <p>12 A. I notarize -- I notarize his signature</p> <p>13 only. I notarize his signature only.</p> <p>14 Q. Okay. So, just to be clear, and to close</p> <p>15 this off, "Passport Services," involves the</p> <p>16 notarization of passport applicants on passport</p> <p>17 applications, correct?</p> <p>18 A. So, on the Passport Services, there is no</p> <p>19 application; there is only Power of Attorney.</p> <p>20 MR. SINAICO: Okay. I'm going to suggest</p> <p>21 it's 12:30 now. I'm going to suggest that we take</p> <p>22 our lunch break, and we resume at 1:30, if that's</p> <p>23 okay with everybody.</p> <p>24 MS. KROPP: Okay. That's fine. I don't</p> <p>25 know if we want to have a conversation about the</p>

<p style="text-align: right;">Page 66</p> <p>1 A. ABU HBDA</p> <p>2 translation on the record or off the record.</p> <p>3 MR. SINAICO: I guess we could have a</p> <p>4 conversation about translation off the record, but</p> <p>5 after we have the conversation about translation</p> <p>6 off the record, we need to have the conversation</p> <p>7 on the record.</p> <p>8 MS. KROPP: That's fine.</p> <p>9 MR. SINAICO: Why don't Mr. Abu Hbda be</p> <p>10 excused, so he could have his lunch, And Counsel</p> <p>11 can have the conversation about translation, and</p> <p>12 we'll plan to resume at 1:34. Actually, you know</p> <p>13 what, I take it back. Let's plan to resume at</p> <p>14 1:34.</p> <p>15 THE VIDEOGRAPHER: Okay. We're now off</p> <p>16 the record. The time is 16:34 UTC Time.</p> <p>17 (Whereupon, a short recess was taken.)</p> <p>18 THE VIDEOGRAPHER: We are now back on the</p> <p>19 record. The time is 17:39 UTC Time.</p> <p>20 MR. SINAICO: I will just point out to</p> <p>21 everyone on the call, before we resume the</p> <p>22 examination of Mr. Abu Hbda, that we have a new</p> <p>23 translator now. The translator, maybe the new</p> <p>24 translator could identify himself by name and be</p> <p>25 sworn by the court reporter.</p>	<p style="text-align: right;">Page 68</p> <p>1 A. ABU HBDA</p> <p>2 BY MR. SINAICO:</p> <p>3 Q. Mr. Abu Hbda, I hope you had a terrific</p> <p>4 lunch. Are you ready to resume?</p> <p>5 A. Yes.</p> <p>6 Q. Do we wait, the translate -- I don't --</p> <p>7 maybe you don't need the translator, but if the</p> <p>8 translator's here, we should use the translator.</p> <p>9 A. I'm ready.</p> <p>10 MR. SINAICO: Okay. Cosette, could we</p> <p>11 bring up -- could we bring up Tab 4, again,</p> <p>12 please?</p> <p>13 MS. VINCENT: Yes.</p> <p>14 MR. SINAICO: I'm sorry, I meant Tab 2,</p> <p>15 Exhibit 4.</p> <p>16 MS. VINCENT: I got you.</p> <p>17 MR. SINAICO: Done, and done.</p> <p>18 Q. Okay. We're going to stay on Page 2, and</p> <p>19 we're going to resume -- we're going to try to run</p> <p>20 back over some material we did before where we were</p> <p>21 having trouble with the translation; is that okay,</p> <p>22 Mr. Abu Hbda? Please, if we don't need the</p> <p>23 translator, we could excuse him, but if we need the</p> <p>24 translator --</p> <p>25 A. Yes, sir.</p>
<p style="text-align: right;">Page 67</p> <p>1 A. ABU HBDA</p> <p>2 THE INTERPRETER: Sure. My name is</p> <p>3 Sadeer; S-A-D-E-E-R; this is the first name. Al,</p> <p>4 A-L, space, Amiri, A-M-I-R-I, and it's written on</p> <p>5 the screen.</p> <p>6 - o o o -</p> <p>7</p> <p>8 H A D E E R A L A M I R I,</p> <p>9 Called as the interpreter in this</p> <p>10 matter, was duly sworn by a Notary Public to</p> <p>11 accurately and faithfully translate the</p> <p>12 questions propounded to the Awni Abu Hbda</p> <p>13 from English into Arabic, and the answers</p> <p>14 given by the Awni Abu Hbda from Arabic into</p> <p>15 English.</p> <p>16 - o o o -</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 69</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. Returning to the top of the page.</p> <p>3 Do you see in the center of the page says, "Legalize</p> <p>4 You Documents"; do you see that, sir?</p> <p>5 A. Yes, I see it.</p> <p>6 Q. And, "Legalize You Documents," is one of</p> <p>7 the services that Awni Abu Hbda Documentation</p> <p>8 Services provides; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And can you describe the nature of</p> <p>11 the service, "Legalize You Documents"?</p> <p>12 A. It's like a notarization, when somebody</p> <p>13 comes to sign a document, and you witness this</p> <p>14 signature, and you sign it. It's like a notary</p> <p>15 public service.</p> <p>16 Q. Okay. And apart from witnessing or</p> <p>17 notarizing a signature, does, "Legalize You</p> <p>18 Documents," entail any other type of service?</p> <p>19 A. If someone wants to notarization, if he</p> <p>20 wants to send the papers to the embassy to be</p> <p>21 signed, we take the papers and send them to that</p> <p>22 embassy.</p> <p>23 Q. Okay. And the embassies to which you</p> <p>24 sign -- to which you send these papers -- let me</p> <p>25 withdraw that and start again.</p>

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<p style="text-align: right;">Page 70</p> <p>1 A. ABU HBDA</p> <p>2 The embassies to which you send these</p> <p>3 papers, those includes embassies associated with the</p> <p>4 Palestinian Authority, or the Palestinian</p> <p>5 association; is that correct, sir?</p> <p>6 A. It's representative of the Palestinian</p> <p>7 population in Canada.</p> <p>8 Q. And do you understand that this</p> <p>9 representative of the Palestinian people in Canada</p> <p>10 is in some fashion associated with the Palestinian</p> <p>11 Liberation Organization or the Palestinian</p> <p>12 Authority?</p> <p>13 A. I don't know the relationship or the rules</p> <p>14 in that country. All I know is that it's a</p> <p>15 representative of the Palestinian application in</p> <p>16 Canada and it documents or certify documents.</p> <p>17 Q. Thank you, Mr. Abu Hbda.</p> <p>18 MR. SINAICO: Let's mark as our next</p> <p>19 Exhibit a 55-page document that is titled on the</p> <p>20 front page, "Declaration of C. Russell."</p> <p>21 This is Tab 10C. Cosette, could you bring</p> <p>22 it up, please?</p> <p>23 MS. VINCENT: It will be up shortly.</p> <p>24 (Whereupon, Declaration of C. Russell was</p> <p>25 marked as Exhibit 5 for identification, as of</p>	<p style="text-align: right;">Page 72</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes, sir.</p> <p>3 Q. And you were saying the signature there,</p> <p>4 that's your signature; is that correct, sir?</p> <p>5 A. Yes.</p> <p>6 Q. Do you see the raised seal immediately to</p> <p>7 the left of your black ink seal?</p> <p>8 A. Yes.</p> <p>9 Q. Is that a notarial seal?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Whose notarial seal was that?</p> <p>12 A. For me.</p> <p>13 Q. Okay. And do you see that there are a</p> <p>14 number of other stamps on this document? There's a</p> <p>15 stamp -- let me withdraw that.</p> <p>16 Do you see there's a stamp in blue ink,</p> <p>17 and there's a stamp in red ink on this document?</p> <p>18 A. Exactly, yes.</p> <p>19 Q. And, sir, is this an example of a document</p> <p>20 that Awni Abu Hbda Documentation Services legalized?</p> <p>21 A. It maybe like -- certificates, graduation</p> <p>22 certificates, death certificates, authorization.</p> <p>23 Yes, this is one of them; yes, maybe.</p> <p>24 Q. Okay. And are you able to read the blue</p> <p>25 ink stamp?</p>
<p style="text-align: right;">Page 71</p> <p>1 A. ABU HBDA</p> <p>2 April 7th, 2021.)</p> <p>3 A. Yes, sir.</p> <p>4 Q. And, specifically, we're going to turn to</p> <p>5 Page 52 of the document.</p> <p>6 MR. SINAICO: Page --</p> <p>7 MS. VINCENT: Yeah, I'm going to have to</p> <p>8 exit out of there as quick as possible. I'll</p> <p>9 share my screen in a moment.</p> <p>10 MR. SINAICO: Can we rotate that around,</p> <p>11 so Mr. Abu Hbda could see that more clearly?</p> <p>12 MS. VINCENT: I'll rotate it. One moment.</p> <p>13 Q. Can you see the page that we're focusing</p> <p>14 on from Exhibit 5, Mr. Abu Hbda?</p> <p>15 A. Yes, I do.</p> <p>16 Q. Okay. And do you recognize that this is a</p> <p>17 document that you've seen before, sir?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Okay. And do you see that there's a stamp</p> <p>20 in black ink in the upper left-hand corner, and a</p> <p>21 raised seal, and the stamp in black ink says, "Abu</p> <p>22 Hbda"; do you see that, sir?</p> <p>23 A. Yes, I do.</p> <p>24 Q. And the stamp in black ink, that's your</p> <p>25 notarial stamp; is that correct, sir?</p>	<p style="text-align: right;">Page 73</p> <p>1 A. ABU HBDA</p> <p>2 MR. SINAICO: Cosette, could you zoom in</p> <p>3 on the blue ink stamp, please.</p> <p>4 Q. Is that okay, Mr. Hbda. Can you see it?</p> <p>5 A. It says, "General Palestinian Delegation</p> <p>6 Canada."</p> <p>7 Q. Okay. And is that the office in Canada to</p> <p>8 which you emailed documents when you want them</p> <p>9 legalized?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And now, let's look at the red ink stamp.</p> <p>12 Can you read the red ink stamp, sir?</p> <p>13 A. Not all of it.</p> <p>14 Q. Okay. Are you familiar with that stamp,</p> <p>15 sir?</p> <p>16 A. Yes, I've seen stamps like this.</p> <p>17 Q. So, although you're unable to read the</p> <p>18 stamp in its entirety, can you read the portions of</p> <p>19 it that you are able to read?</p> <p>20 MR. SINAICO: Let the record reflect that</p> <p>21 Mr. Abu Hbda translated the red ink stamp to the</p> <p>22 best he was able to --</p> <p>23 A. It says the a Palestinian delegation</p> <p>24 legalized this document, but it doesn't confirm the</p> <p>25 contents or the information inside this document.</p>

<p style="text-align: right;">Page 74</p> <p>1 A. ABU HBDA</p> <p>2 It's not responsible for the content inside this</p> <p>3 document.</p> <p>4 Q. And you can see inside, Mr. Abu Hbda, do</p> <p>5 you see that there is a blue ink signature inside</p> <p>6 the red ink stamp?</p> <p>7 A. Yes.</p> <p>8 Q. And are you able to tell us whose</p> <p>9 signature that is?</p> <p>10 A. To be honest, I don't know whose signature</p> <p>11 is that.</p> <p>12 Q. Okay. And this stamp, is this a stamp</p> <p>13 that's typically -- let me withdraw the question and</p> <p>14 try again.</p> <p>15 Is this red ink stamp a stamp that</p> <p>16 typically appears on documents that you have</p> <p>17 legalized for your clients?</p> <p>18 A. Not all the documents, no.</p> <p>19 Q. Do you have any understanding as to which</p> <p>20 types of documents this red ink stamp would appear</p> <p>21 on and which not?</p> <p>22 A. I'm not sure, but I think maybe it's the</p> <p>23 certificates that has this red ink stamp, while</p> <p>24 other documents, they don't have this stamp.</p> <p>25 Q. Okay. And do you have any understanding</p>	<p style="text-align: right;">Page 76</p> <p>1 A. ABU HBDA</p> <p>2 looking at the wrong document. I want to look at</p> <p>3 Tab 2, which is also Exhibit 4.</p> <p>4 MS. VINCENT: Sorry.</p> <p>5 MR. SINAIKO: It's okay. Take your time.</p> <p>6 Bear with us for just a moment, Mr. Abu</p> <p>7 Hbda.</p> <p>8 There we go. Back to Page 2.</p> <p>9 Q. Okay. Now, underneath, "Legalize You</p> <p>10 Documents," you see that there are a number of</p> <p>11 different types of -- there are a number of</p> <p>12 different entities on that page?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. The first one is, "Awni Abu Hbda</p> <p>15 Service Registration Form"; do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Can you tell us what that is.</p> <p>18 A. This is registering a client. If someone</p> <p>19 comes to my office, I register his office or enter</p> <p>20 his name in a book.</p> <p>21 Q. Ah. Is that a book where you record your</p> <p>22 notarial act, sir?</p> <p>23 A. It's a regular page. I don't see -- of</p> <p>24 this pages it changes day by day.</p> <p>25 Q. Got it. But, this service registration</p>
<p style="text-align: right;">Page 75</p> <p>1 A. ABU HBDA</p> <p>2 as to who placed the red ink stamp on this document?</p> <p>3 A. The council, or the delegation of both the</p> <p>4 council.</p> <p>5 Q. And that's a person in this office in</p> <p>6 Canada that you mentioned earlier, this delegation</p> <p>7 office to which you mail papers, which you would</p> <p>8 like papers legalized for your clients, correct?</p> <p>9 A. This is what this supposed to be.</p> <p>10 Q. Okay. But just to clarify, my question</p> <p>11 was the office where that stamp was applied was the</p> <p>12 office -- as you understand it, the office where</p> <p>13 that stamp was applied was the office in Canada to</p> <p>14 which you send documents when your clients asked you</p> <p>15 to have them legalized; is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okie doke.</p> <p>18 MR. SINAIKO: Now, let's go back for a</p> <p>19 moment to Exhibit 4. Okay. Now, Cosette, we're</p> <p>20 getting Exhibit 4 back up.</p> <p>21 MS. VINCENT: Yes, we are.</p> <p>22 MR. SINAIKO: Okay. And let's turn to</p> <p>23 Page 2 for Mr. Abu Hbda.</p> <p>24 MS. VINCENT: Is this the page you want?</p> <p>25 MR. SINAIKO: I'm sorry, I think we're</p>	<p style="text-align: right;">Page 77</p> <p>1 A. ABU HBDA</p> <p>2 form, this is not a document you would legalize?</p> <p>3 This is a piece of paper you have your clients</p> <p>4 complete, so you could provide services to them; is</p> <p>5 that correct?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. Going back up to Legalize You</p> <p>8 Documents for one moment. What do you typically</p> <p>9 charge clients to Legalize You Documents for them?</p> <p>10 A. If it's only notary public, I charge from</p> <p>11 five to 15 to 20; this is only if it's notary</p> <p>12 public.</p> <p>13 Q. Right. And if they're -- in the instances</p> <p>14 where you're asked to legalize a document by</p> <p>15 transmitting it to this office in Canada, what do</p> <p>16 you charge clients to do that?</p> <p>17 A. So, the service includes the postage that</p> <p>18 we use to send it, the fees that they charge us, and</p> <p>19 the preventative to cancel it, and our fees. So, it</p> <p>20 ranges from 250 to 300. Again, this includes the</p> <p>21 postage, and includes the money postage. We -- the</p> <p>22 money order to pay for the fees that we -- council</p> <p>23 charges, or that office charges, plus our fees to</p> <p>24 legalize the document. The total is between \$250</p> <p>25 and \$300 in total.</p>

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<p style="text-align: right;">Page 78</p> <p>A. ABU HBDA</p> <p>Q. And Mr. Abu Hbda, what does your business charge -- let me withdraw that question and ask it more crisply.</p> <p>Mr. Hbda -- I'm going to try one more time here.</p> <p>Mr. Abu Hbda, what is your fee, putting aside the fees for postage, and fees charged by the council, whatever you charge, what is your fee that you charge for the document?</p> <p>A. Between \$50 to \$100.</p> <p>Q. And how frequently would you say -- well, let's just -- let me withdraw that question and try again.</p> <p>How frequently would you say that you send documents to this office in Canada that we've been talking about, this delegation of the Palestinian people that you mentioned; how frequently would you say that you send documents to that office that -- to be legalized?</p> <p>A. It may be once a week or maybe every day; it's variable. It depends on the people.</p> <p>Q. So, would it be fair to say that over the last year, you've done that at least 50 times?</p> <p>A. I don't have the number. I cannot tell.</p>	<p style="text-align: right;">Page 80</p> <p>A. ABU HBDA</p> <p>A. Yes, sir. No.</p> <p>Q. Okay. Do the Passport Services that your company provide, or -- withdrawn.</p> <p>Do the Passport Services that your business provides relate in any way to passports issued by the Palestinian Authority, or the Palestinian Liberation Authority, to the extent such exist?</p> <p>A. We write an authorization between two persons; one person here and one person in Palestinian. This has no relation to the PLO, or the organization; it's two persons.</p> <p>Q. What is the nature of this authorization that you're talking about?</p> <p>A. It gives authorization to this person to renew the passport for that other person. We just notarized this document.</p> <p>Q. I see. Is this a document that's issued by the Palestinian Authority, and that you assist one of your customers in executing?</p> <p>A. No, most of the time we write it. It's a handwritten. This person authorizes that person to do the renew; that's it.</p> <p>Q. And is there a prescribed form of words</p>
<p style="text-align: right;">Page 79</p> <p>A. ABU HBDA</p> <p>Q. Okay. So, ballpark, you're not prepared to say you did it at least 50 times over the last year?</p> <p>A. I don't know. To be honest, I'm not sure.</p> <p>Q. But you'd say --</p> <p>Well, just to go back to what you said before. You'd say that you do it several times a month; is that correct, sir?</p> <p>A. Maybe more. I don't know.</p> <p>Q. Okay. Let's go down to a few stops on the document. Do you see that it says, "Passport Services"?</p> <p>A. This is in total.</p> <p>THE INTERPRETER: I will repeat the question. It seems he did not hear it.</p> <p>MR. SINAICO: Okay. Go ahead.</p> <p>A. Yes, sir.</p> <p>Q. And can you tell me, does, "Passport Services," include -- well, withdrawn.</p> <p>The Passport Services that your company provides, does that include the transmission of documents to the office in Canada that we've been talking about, the delegation of the Palestinian people, as you describe it?</p>	<p style="text-align: right;">Page 81</p> <p>A. ABU HBDA</p> <p>that that document needs to include in order to be legally valued?</p> <p>A. No, to accept another person to renew the passport, they accept any notarize document, only in America, not only for me, but in the whole state in America.</p> <p>Q. Right. And are these documents that are used to apply for or renew passports issued by the Palestinian Authority or the Palestinian Liberation Organization?</p> <p>A. No, these are the Palestinian passports.</p> <p>Q. Right. So, is it -- how -- well, let me withdraw that.</p> <p>How do you understand --</p> <p>After you prepare and understand and notarize one of these documents, how do you understand that your clients utilize these documents; in other words, what do they do with them?</p> <p>A. He sends these documents by FedEx to the other person, and after this leaves my office, I don't know what happens to him. I don't know anything about him after he leaves.</p> <p>Q. Okay. And this passport service that you</p>

<p style="text-align: right;">Page 82</p> <p>1 A. ABU HBDA</p> <p>2 perform in connection with passports by the</p> <p>3 Palestinian Authority, how long have you been</p> <p>4 performing that service?</p> <p>5 A. I don't know to be honest. I've been</p> <p>6 notarizing papers for customers for long time, but I</p> <p>7 don't have an idea of how long exactly.</p> <p>8 Q. Would you say it's been at least five</p> <p>9 years?</p> <p>10 A. Maybe. It may be five, it may be seven,</p> <p>11 it may be more. I don't know.</p> <p>12 Q. Okay. The preparation of these documents</p> <p>13 is important in order for a person in the United</p> <p>14 States to be able to obtain or renew a passport</p> <p>15 issued by the Palestinian Authority; is that</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. And did there come a time when you learned</p> <p>19 how to prepare these documents, so that they would</p> <p>20 be legally effective when presented to these</p> <p>21 authorities, you know, were presented to the</p> <p>22 Palestinian Authority?</p> <p>23 A. Sometimes --</p> <p>24 THE INTERPRETER: I'm sorry.</p> <p>25 A. Sometimes customers bring all of the form</p>	<p style="text-align: right;">Page 84</p> <p>1 A. ABU HBDA</p> <p>2 Authority ever explained to you any aspect of the</p> <p>3 process of the issuance or renewal of a passport by</p> <p>4 the Palestinian Authority?</p> <p>5 A. No.</p> <p>6 Q. Okay. And these Passport Services that</p> <p>7 you provide that are referenced on Page 2 of Exhibit</p> <p>8 4, have you ever performed those Passport Services</p> <p>9 in connection with the issuance or renewal of a</p> <p>10 passport, other than by the Palestinian Authority?</p> <p>11 A. Yes, there is. I performed services for</p> <p>12 passports to travel to Jordan, and, also, for the</p> <p>13 Egyptian government. So, anyone who come requesting</p> <p>14 this service, I file the form for him or for her.</p> <p>15 Q. Okay. Let's move down to, "Family</p> <p>16 Matters"; do you see that, Mr. Abu Hbda?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Can you describe that service to us,</p> <p>19 please.</p> <p>20 A. So, if two people fight at home, like a</p> <p>21 husband and a wife, I try to solve the issue between</p> <p>22 them, and if there's another issue, like a daughter</p> <p>23 with her father, or a family member with another</p> <p>24 family member for the Palestinian population, I come</p> <p>25 and try to solve the issue for them.</p>
<p style="text-align: right;">Page 83</p> <p>1 A. ABU HBDA</p> <p>2 papers written and sent to them from my home</p> <p>3 country, and they wanted to be notarized.</p> <p>4 Q. Right, but you mentioned -- thank you very</p> <p>5 much.</p> <p>6 You mentioned before, Mr. Abu Hbda, that</p> <p>7 sometimes you prepared the document, right?</p> <p>8 Sometimes you prepared the document that has to be</p> <p>9 notarized and then returned to the Palestinian</p> <p>10 Authority, correct?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. How did you learn the proper</p> <p>13 wording to put in these documents, so that when</p> <p>14 presented to the Palestinian Authority, the</p> <p>15 documents would have the desired effect?</p> <p>16 A. We made copies from the papers that were</p> <p>17 brought to us and then we started using them.</p> <p>18 Q. Okay. Have you ever familiarized yourself</p> <p>19 for the legal requirements for the issuance or</p> <p>20 renewal of a passport by the Palestinian Authority?</p> <p>21 A. I know that from the people who come,</p> <p>22 these people have spoken with the people who they</p> <p>23 want to authorize, and they gave -- they give them</p> <p>24 the information.</p> <p>25 Q. Has any representative of the Palestinian</p>	<p style="text-align: right;">Page 85</p> <p>1 A. ABU HBDA</p> <p>2 Q. Got it. And so is that a service that</p> <p>3 falls within the category of legalization of</p> <p>4 documents?</p> <p>5 A. Yeah, sometimes -- thank you. Sometimes</p> <p>6 they have written documents, or have filed claims</p> <p>7 against each other, and through each of them, and</p> <p>8 then they come, and the issue solve them; they try</p> <p>9 to discharge the claim, dissolve the claim, and they</p> <p>10 write the paper, and I notarize this paper.</p> <p>11 Q. And that's a service that you provide as a</p> <p>12 Notary Public of the State of New Jersey; is that</p> <p>13 correct?</p> <p>14 A. It is a service that I provide for the</p> <p>15 population, the Palestinian population, to solve the</p> <p>16 issues or the altercations between the persons.</p> <p>17 Q. And you know to whom these documents you</p> <p>18 note relating to Family Matters are submitted by</p> <p>19 your customers?</p> <p>20 A. I give it to the person responsible, and</p> <p>21 he submits it to the Court to discharge or resolve</p> <p>22 the claim after they drop the case, and all these</p> <p>23 services are free, just to clarify. I don't get any</p> <p>24 payment for these services; I provide it for free.</p> <p>25 Q. Excellent. And these services are with</p>

<p style="text-align: right;">Page 86</p> <p>1 A. ABU HBDA</p> <p>2 respect to legal proceedings in the United States;</p> <p>3 is that correct?</p> <p>4 A. If there is a claim, yes, but if there</p> <p>5 isn't a claim, we just try to solve the issue</p> <p>6 between them, and they come in peace between them.</p> <p>7 Q. Excellent. Let's move down to the next</p> <p>8 one here. It says, "Driver License Certification";</p> <p>9 do you see that one, sir?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Okay. And can you tell us what Driver</p> <p>12 License Certification -- withdrawn.</p> <p>13 Can you tell us what service Driver</p> <p>14 License Certification involves, or can you describe</p> <p>15 the service?</p> <p>16 A. Okay. So, they stopped at this entity</p> <p>17 before a while ago. We used to do a translation, if</p> <p>18 someone comes from an Arabic country, or the</p> <p>19 driver's license from that country, we try to</p> <p>20 translate and validate this driver's license, and</p> <p>21 notarize it, and he takes it to the DMV, but now it</p> <p>22 stopped. It's not longer available.</p> <p>23 Q. And when did that service cease to be</p> <p>24 available?</p> <p>25 A. It stopped at a point now, but they</p>	<p style="text-align: right;">Page 88</p> <p>1 A. ABU HBDA</p> <p>2 these Life Certificate documents have, you know,</p> <p>3 well -- withdrawn.</p> <p>4 Do you know whether any of the Life</p> <p>5 Certificate documents you've certified have been</p> <p>6 used for the purposes of collecting a pension, or</p> <p>7 money, or from the Palestinian Authority, or the</p> <p>8 Palestinian Liberation Organization?</p> <p>9 A. I don't know that.</p> <p>10 Q. So, it's possible that the answer is yes;</p> <p>11 is that correct, sir?</p> <p>12 MR. BERGER: Objection to the form of the</p> <p>13 question; calls for speculation.</p> <p>14 Q. Mr. Abu Hbda, you may answer.</p> <p>15 MR. SINAICO: Can we have the question</p> <p>16 repeated for Mr. Abu Hbda, please?</p> <p>17 (Whereupon, the requested portion was read</p> <p>18 back by the reporter.)</p> <p>19 A. I don't know. I can't tell you. No, I</p> <p>20 don't know.</p> <p>21 Q. Okay. So, my question to you, sir, is, is</p> <p>22 it possible that the answer to the question is yes?</p> <p>23 MR. BERGER: I object to the form of the</p> <p>24 question; calls for speculation, and it's been</p> <p>25 asked and answered.</p>
<p style="text-align: right;">Page 87</p> <p>1 A. ABU HBDA</p> <p>2 specified certain authorized people to do this</p> <p>3 service.</p> <p>4 Q. Okay. So, when you say they -- when you</p> <p>5 say, "they specified certain authorized people," who</p> <p>6 is, "they"?</p> <p>7 A. The DMV in New Jersey.</p> <p>8 Q. Okay. Got it. Is that a service that you</p> <p>9 ever performed, so that a driver's license could be</p> <p>10 certified to any entity outside the United States?</p> <p>11 A. No.</p> <p>12 Q. Okay. Let's move down to, "Life</p> <p>13 Certificate." Can you tell us what service</p> <p>14 involves, "Life Certificate"?</p> <p>15 A. So, this service is a service where, from</p> <p>16 all over the Arabic countries, people are retired,</p> <p>17 and they have to prove that their still alive to</p> <p>18 receive their retirement. So, they come to my</p> <p>19 office with the proper documents that they have</p> <p>20 that -- the ID and the passport, and we write a form</p> <p>21 and they sign it. I notarize it to prove that this</p> <p>22 person is still alive, and then the person takes it</p> <p>23 and sends it to his government, and to be able to</p> <p>24 receive the retirement.</p> <p>25 Q. Right. And do you know whether any of</p>	<p style="text-align: right;">Page 89</p> <p>1 A. ABU HBDA</p> <p>2 MR. SINAICO: Mr. Berger, let me ask the</p> <p>3 question.</p> <p>4 Q. Is it possible that one or more of the</p> <p>5 Life Certificate documents that you assisted in</p> <p>6 preparing have been submitted to the -- a -- or the</p> <p>7 Palestinian Liberation Authority, or Palestinian</p> <p>8 Liberation Organization, for purposes of collecting</p> <p>9 a pension or money from one of those entities?</p> <p>10 MR. BERGER: And I object to the question,</p> <p>11 even though it was re-worded, because it calls for</p> <p>12 speculation.</p> <p>13 MR. SINAICO: Okay. The objection has</p> <p>14 been noted, and the Witness should answer.</p> <p>15 A. I don't know. Not even a single one. I</p> <p>16 don't know anything about these documents.</p> <p>17 Q. These documents that you assist in</p> <p>18 preparing, right?</p> <p>19 A. Maybe. I haven't done, not even a single</p> <p>20 one. I don't remember whether I've done it, or</p> <p>21 maybe I haven't done any of them.</p> <p>22 Q. So, you have no recollection, one way or</p> <p>23 the other, whether any of these documents were for</p> <p>24 the purpose of collecting a pension, or money from</p> <p>25 the Palestinian Liberation Organization, or the</p>

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90 to 93

<p style="text-align: right;">Page 90</p> <p>1 A. ABU HBDA</p> <p>2 Palestinian Liberation Authority; is that correct?</p> <p>3 A. I don't know. I don't know.</p> <p>4 Q. Okay. Okay. Let's move down to the next</p> <p>5 item on this page. It says, "Trade Certification."</p> <p>6 can you tell us -- can you tell us what service that</p> <p>7 involves?</p> <p>8 A. I haven't done any of this; none.</p> <p>9 Q. Okay. Can you describe the nature of this</p> <p>10 service, whether or not you've actually performed</p> <p>11 it?</p> <p>12 A. Maybe it involves registering a company in</p> <p>13 New Jersey.</p> <p>14 Q. Okay. Does it involve registering any</p> <p>15 companies or businesses outside of the United</p> <p>16 States?</p> <p>17 A. No, I haven't done none -- neither inside,</p> <p>18 nor outside the States. I didn't do any of them.</p> <p>19 Q. Okay. Let's go down to the next one,</p> <p>20 "Academic Record Certification"; can you describe</p> <p>21 that service for me, please?</p> <p>22 A. This is a service where if a doctor</p> <p>23 graduates from a university, or a hospital, or a</p> <p>24 program, we certify this degree for this person to</p> <p>25 be able to work in other countries back in Jordan,</p>	<p style="text-align: right;">Page 92</p> <p>1 A. ABU HBDA</p> <p>2 maybe. In Canada.</p> <p>3 Q. Is Canada the same office that we were</p> <p>4 talking about before, correct, sir?</p> <p>5 MR. SINAIKO: Let the record reflect that</p> <p>6 Mr. Abu Hbda answered the question in English,</p> <p>7 before the translation came.</p> <p>8 Q. Sir, have you ever had personal authority</p> <p>9 to provide certification of a document on behalf of</p> <p>10 the Palestinian Authority?</p> <p>11 A. No.</p> <p>12 Q. Have you ever personally had the authority</p> <p>13 to certify any document on behalf of the Palestine</p> <p>14 Liberation Organization?</p> <p>15 A. No.</p> <p>16 Q. Okay. In connection with the documents</p> <p>17 that you submit to an office in Canada that we've</p> <p>18 been talking about, I believe you mentioned that the</p> <p>19 office in Canada charges some sort of a fee; is</p> <p>20 that -- do you recall that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And you, you know --</p> <p>23 Again, do you remember that you told us</p> <p>24 before that you also -- you also collect a fee from</p> <p>25 the customer yourself?</p>
<p style="text-align: right;">Page 91</p> <p>1 A. ABU HBDA</p> <p>2 Palestinian, Lebanon. So, he brings this documents,</p> <p>3 and we certify this document, so that he can work in</p> <p>4 these other countries.</p> <p>5 Q. And when you say you certify the document,</p> <p>6 what do you mean by that?</p> <p>7 A. We send it to the embassy of the country</p> <p>8 that he's entering into.</p> <p>9 Q. Okay. So, this would be -- and just to,</p> <p>10 you know, go back to the document, if we need to,</p> <p>11 and let me know if you'd like to go back to the</p> <p>12 document, but I'm thinking, is this a service</p> <p>13 similar to the service that you performed with</p> <p>14 respect to, you know, the document that had the red</p> <p>15 and blue stamps that we were looking at before?</p> <p>16 A. Approximately, yes. It's similar. It's</p> <p>17 the same thing.</p> <p>18 Q. Okay. And that's the service that you</p> <p>19 could perform just to get records certified by the</p> <p>20 Palestinian Authority or the Palestinian Liberation</p> <p>21 Authority, correct; Palestinian Liberation</p> <p>22 Organization?</p> <p>23 A. No, it's not -- neither from the</p> <p>24 Palestinian government, no. The Liberation, the</p> <p>25 Liberation, it's from the office in Washington,</p>	<p style="text-align: right;">Page 93</p> <p>1 A. ABU HBDA</p> <p>2 A. Correct.</p> <p>3 Q. Has there ever been a circumstance in</p> <p>4 which the office in Canada, to which you sent</p> <p>5 documents, has shared a portion of its fee with you?</p> <p>6 A. No.</p> <p>7 Q. Have you ever asked -- let me withdraw</p> <p>8 that question. It's an inartful question.</p> <p>9 Have you ever asked that the office in</p> <p>10 Canada, to which you've been submitting documents,</p> <p>11 as we've been discussing, to share its fee with you?</p> <p>12 A. No.</p> <p>13 Q. Is the office in Canada to which you</p> <p>14 submit documents aware that you charge a fee to your</p> <p>15 customers for making these submissions on their</p> <p>16 behalf?</p> <p>17 MR. BERGER: Objection, calls for</p> <p>18 speculation.</p> <p>19 Q. To your knowledge?</p> <p>20 A. I'm sorry, could you repeat the question.</p> <p>21 Q. Let me rephrase the question. To your</p> <p>22 knowledge, is the -- are the -- is the office in</p> <p>23 Canada that we've been talking about aware that when</p> <p>24 you submit documents to them for certification, you</p> <p>25 are collecting a fee for your customers?</p>

<p style="text-align: right;">Page 94</p> <p>1 A. ABU HBDA</p> <p>2 A. For my fee -- for my fees. Why are they</p> <p>3 concerned with my fees?</p> <p>4 Q. Okay. Let's get the question read back.</p> <p>5 MR. SINAICO: I would like to just have</p> <p>6 the question read back because I think the</p> <p>7 question was pretty clear, and we should just get</p> <p>8 an answer to it. I think -- could we just ask the</p> <p>9 question of Mr. Abu Hbda again.</p> <p>10 THE INTERPRETER: Sure.</p> <p>11 (Whereupon, the requested portion was read</p> <p>12 back by the reporter.)</p> <p>13 A. They are not concerned because why are</p> <p>14 they concerned with my fees? They -- the customers</p> <p>15 bring a money order for the fees that the office</p> <p>16 charges from, and then I will speak with the</p> <p>17 customer, and they pay me my fees. So, this --</p> <p>18 these are two separate things. Why are they</p> <p>19 involved with my fees? These fees go to a money</p> <p>20 order.</p> <p>21 Q. I'm going to try the question again.</p> <p>22 To your knowledge, is the office in Canada</p> <p>23 to which you submit documents --</p> <p>24 This office in Canada we've been</p> <p>25 discussing; is the office in Canada aware that you</p>	<p style="text-align: right;">Page 96</p> <p>1 A. ABU HBDA</p> <p>2 which you send documents to be certified or</p> <p>3 legalized?</p> <p>4 A. No, like in situations where the papers</p> <p>5 takes a long time, you call and leave a message.</p> <p>6 You don't speak with anybody personally and they</p> <p>7 don't pick up the phone.</p> <p>8 Q. Okay. Putting aside oral communications,</p> <p>9 have you ever communicated in writing with anybody</p> <p>10 in this office in Canada that we've been discussing?</p> <p>11 A. No.</p> <p>12 Q. Okay. Let's go down two stops -- we're</p> <p>13 still on Page 2 of Exhibit 4. Let's go down two</p> <p>14 stops to, "Power of Attorney"; do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Can you describe that service for us?</p> <p>17 A. So, this document special for Palestinians</p> <p>18 who want to give Powers of Attorney, or authorize</p> <p>19 people; example either registering a land, either</p> <p>20 divorce in the court of the legal court, or doing</p> <p>21 something where they cannot go to the home country,</p> <p>22 they authorize or give the Powers of Attorney to</p> <p>23 another person over there to do that.</p> <p>24 Q. And these are Powers of Attorney that are</p> <p>25 used in areas under control of the Palestinian</p>
<p style="text-align: right;">Page 95</p> <p>1 A. ABU HBDA</p> <p>2 charge a fee to your clients in connection with the</p> <p>3 performance of that service; are you aware?</p> <p>4 A. They never asked me. I never asked them.</p> <p>5 Q. So, the answer is, you don't know whether</p> <p>6 they're aware or not; is that correct, sir?</p> <p>7 A. I don't know. I don't interfere with</p> <p>8 those things. I don't even speak with them. I</p> <p>9 don't know.</p> <p>10 Q. Actually, that's -- that raises one</p> <p>11 question I had, and we could just address it now.</p> <p>12 Have you ever communicated orally with any</p> <p>13 representative of this office in Canada that we are</p> <p>14 discussing there?</p> <p>15 A. Is -- there is certain situation where you</p> <p>16 call, basically to just inquire whether your</p> <p>17 documents have been finished or not.</p> <p>18 Q. Okay. Apart from communications of that</p> <p>19 nature, have you ever communicated orally with</p> <p>20 anybody at the office in Canada that we've been</p> <p>21 talking about? That's the question. Let me</p> <p>22 rephrase the question.</p> <p>23 Apart from communications of that nature,</p> <p>24 have you ever communicated orally with anybody in</p> <p>25 this office in Canada that we've been discussing to</p>	<p style="text-align: right;">Page 97</p> <p>1 A. ABU HBDA</p> <p>2 Authority, to your understanding; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And do you prepare these documents, or are</p> <p>5 they prepared by somebody else, and you just</p> <p>6 notarize the signatures?</p> <p>7 A. Most of the people bring this completed</p> <p>8 document for attorneys in my home country, and we</p> <p>9 just notarize them. They sign these papers in front</p> <p>10 of us. We sign and notarize it.</p> <p>11 Q. And do you ever submit these Powers of</p> <p>12 Attorney to, you know, to the office in Canada, or</p> <p>13 to any other office that you might understand to be</p> <p>14 affiliated with the Palestinian Authority, or the</p> <p>15 Palestinian Liberation Organization?</p> <p>16 A. Sure. So, after this person signs it, I</p> <p>17 sign it and notarize it. We give it to that person,</p> <p>18 and give them the address and contact information</p> <p>19 for the counsel, or the litigant in Canada, and tell</p> <p>20 him that you have to have a money order, and you</p> <p>21 have to send it there, and most people do it.</p> <p>22 Some people tell us that they don't know</p> <p>23 how to do it, and they need us to do it for them.</p> <p>24 So, again, we do this by having the money order, and</p> <p>25 sending it by FedEx to the office in Canada. So,</p>

<p style="text-align: right;">Page 98</p> <p>1 A. ABU HBDA</p> <p>2 it's either or.</p> <p>3 Q. Okay. Let's jump down one more stop here,</p> <p>4 and do you see Mr. Abu Hbda that it says, "Land and</p> <p>5 Property Transaction"?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Can you describe this service that's</p> <p>8 reflected there?</p> <p>9 A. So, this is similar to the authorization I</p> <p>10 spoke about, like if someone wants to sell a land,</p> <p>11 or construe the land in my home country, they bring</p> <p>12 the papers and they sign it in front of us, and we</p> <p>13 notarize it, and we send it to Canada, but before</p> <p>14 that, we have to send them email to the office of</p> <p>15 Land and Corporate in Ramallah, and we get a</p> <p>16 response, and then the communication will directly</p> <p>17 between Canada, the office in Canada and this office</p> <p>18 in Ramallah.</p> <p>19 Q. Okay. Terrific.</p> <p>20 MR. SINAICO: We've been going for an hour</p> <p>21 and ten minutes. Would it be all right if we took</p> <p>22 a short break?</p> <p>23 THE INTERPRETER: I want to continue</p> <p>24 because I don't have time.</p> <p>25 MR. SINAICO: Well, with apologies, I</p>	<p style="text-align: right;">Page 100</p> <p>1 A. ABU HBDA</p> <p>2 registered in that person's name who wants to sell</p> <p>3 it to make sure that he owns it.</p> <p>4 Q. Okay. And is that a procedure that's</p> <p>5 required by the -- by laws or regulations of the</p> <p>6 Palestinian Authority?</p> <p>7 A. No, it's something that to make sure that</p> <p>8 the person who's buying the land is protected, and</p> <p>9 really the land is in the name of the seller. It's</p> <p>10 not required by the government.</p> <p>11 Q. Ah, and how did you learn of the existence</p> <p>12 of this office where you send the emails?</p> <p>13 A. I think the office in Canada sent us an</p> <p>14 email saying you have to email the office in</p> <p>15 Ramallah, and the office in Ramallah will get in</p> <p>16 contact with them.</p> <p>17 Q. And how did you come to receive that email</p> <p>18 from the office in Canada?</p> <p>19 A. Honestly, I don't remember if it came as</p> <p>20 an email or a message. I don't remember.</p> <p>21 Q. Whether it was an email, or a message, my</p> <p>22 question is, do you recall how you came to receive</p> <p>23 that communication from the office in Canada,</p> <p>24 whether it was either in written or oral form?</p> <p>25 A. I don't remember exactly the incident. I</p>
<p style="text-align: right;">Page 99</p> <p>1 A. ABU HBDA</p> <p>2 actually need to take a break for three minutes.</p> <p>3 We could stay on the record, if you want. I just</p> <p>4 need to get up for three minutes and I'll be right</p> <p>5 back.</p> <p>6 THE INTERPRETER: Let's make it five</p> <p>7 minutes.</p> <p>8 MR. SINAICO: Take five. Let's go off the</p> <p>9 record for five minutes. We'll come back at 2:52.</p> <p>10 THE INTERPRETER: Thank you, sir.</p> <p>11 THE VIDEOGRAPHER: Okay. We are now off</p> <p>12 the record at 18:47 UTC Time.</p> <p>13 (Whereupon, a short recess was taken.)</p> <p>14 THE VIDEOGRAPHER: We are now back on the</p> <p>15 record. The time is 18:53 UTC time.</p> <p>16 Q. Mr. Abu Hbda, you mentioned a moment ago,</p> <p>17 in connection with land and property transactions on</p> <p>18 this page, Page 2 of Exhibit 4, that there are times</p> <p>19 where you need to communicate by email with an</p> <p>20 office in Ramallah; do you recall mentioning that?</p> <p>21 A. I just send the email. I don't speak with</p> <p>22 anyone.</p> <p>23 Q. Understood, but what is the purpose of</p> <p>24 these emails?</p> <p>25 A. Just to inspect that the land is really</p>	<p style="text-align: right;">Page 101</p> <p>1 A. ABU HBDA</p> <p>2 don't remember.</p> <p>3 Q. Let's look at one more thing on Page 2</p> <p>4 here. It says -- you see it says, "All Arab Nations</p> <p>5 Documents Certification"?</p> <p>6 A. It's the same, doing certifications,</p> <p>7 certificate, or -- sorry, authorization --</p> <p>8 THE INTERPRETER: Delete that --</p> <p>9 A. -- doing authorization. Doing same thing</p> <p>10 we were doing, like if someone comes from Jordan, we</p> <p>11 do notarization from Jordan. If someone comes to do</p> <p>12 notarization from the Gulf countries, or Egypt, or</p> <p>13 Yemen, or Israel. So, it's the same. It's just</p> <p>14 doing notarizations for other countries.</p> <p>15 Q. Authorizations of what sort?</p> <p>16 A. Notarization.</p> <p>17 Q. Notarization. Got it. I'm so sorry.</p> <p>18 Maybe I misheard. Okay.</p> <p>19 So, just to be clear, I want to make sure</p> <p>20 it's notarization, by you as a Notary Public of the</p> <p>21 State of New Jersey, of a documentation to a foreign</p> <p>22 government?</p> <p>23 A. Correct.</p> <p>24 Q. A foreign government, or the Palestinian</p> <p>25 Authority, or the Palestinian Liberation</p>

<p style="text-align: right;">Page 102</p> <p>1 A. ABU HBDA</p> <p>2 Organization, right?</p> <p>3 A. No, I didn't say that. I said other</p> <p>4 foreign governments. I didn't say Palestinian</p> <p>5 government. I didn't say the Palestinian Liberation</p> <p>6 Organization. Yes, other government; this is what I</p> <p>7 said.</p> <p>8 Q. Okay. So, all Arab nations document</p> <p>9 certification does not -- that service that your</p> <p>10 company performs does not in any way involve the</p> <p>11 Palestinian Authority, or the Palestinian Liberation</p> <p>12 Organization, correct?</p> <p>13 A. I'm a New Jersey Notary. I notarize</p> <p>14 papers to people, and they send it wherever they</p> <p>15 want to. This doesn't change anything for me.</p> <p>16 Q. Understood. So, they -- I mean, they</p> <p>17 could be documents used for any purpose? It's a</p> <p>18 documentation for notarization purposes; is that</p> <p>19 right?</p> <p>20 A. Yes, I -- I'm just a New Jersey Notary,</p> <p>21 and that's all. I just notarize the documents in</p> <p>22 New Jersey; that's all.</p> <p>23 Q. Very good. Okay. I want to go back to a</p> <p>24 topic that we discussed briefly earlier. I'm going</p> <p>25 to try to come back to it. Subsequent to</p>	<p style="text-align: right;">Page 104</p> <p>1 A. ABU HBDA</p> <p>2 you communicated orally with any person you</p> <p>3 understood to be an officer, or an agent, or</p> <p>4 employee, or in any way affiliated with this office</p> <p>5 in Canada that -- that we've been discussing, the</p> <p>6 office to which you submit documents when you would</p> <p>7 like them to be legalized by the Palestinian</p> <p>8 Authority?</p> <p>9 A. No.</p> <p>10 Q. And since you received the Subpoena, have</p> <p>11 you communicated in writing, including by email,</p> <p>12 with any person you understand to be an officer, or</p> <p>13 an agent, or an employee, or in any way affiliate</p> <p>14 with the Palestinian Authority?</p> <p>15 A. No.</p> <p>16 Q. And since you received the Subpoena, have</p> <p>17 you communicated in writing, including via email,</p> <p>18 with any person you understood to be about officer,</p> <p>19 or an agent, or an employee or in any way affiliated</p> <p>20 with the Palestinian Liberation Organization?</p> <p>21 A. No.</p> <p>22 Q. Okay. And since you received the</p> <p>23 Subpoena, have you communicated in writing with any</p> <p>24 person of your understanding to be an officer, or an</p> <p>25 agent, or an employee, or any way affiliated with</p>
<p style="text-align: right;">Page 103</p> <p>1 A. ABU HBDA</p> <p>2 receiving -- well, let me withdraw that.</p> <p>3 Do you remember, Mr. Abu Hbda, that</p> <p>4 earlier today, we looked at one of the Subpoenas</p> <p>5 that you were served with; do you recall that?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. To your recollection -- and by the</p> <p>8 way, let's just --</p> <p>9 I mean, we could confirm it, but the</p> <p>10 Subpoena was served on you. Hang on one second --</p> <p>11 the Subpoena was served on you around March 11th;</p> <p>12 does that sound right, sir?</p> <p>13 A. Correct.</p> <p>14 Q. Since you received the Subpoena, have you</p> <p>15 communicated orally with any person you understood</p> <p>16 to be an officer, agent, or employee, or in any way</p> <p>17 related to the Palestinian Authority?</p> <p>18 A. No.</p> <p>19 Q. And since you received the Subpoena, have</p> <p>20 you communicated orally with any person you</p> <p>21 understood to be an officer, or agent, or employee,</p> <p>22 or in any way related to the Palestinian Liberation</p> <p>23 Organization?</p> <p>24 A. No.</p> <p>25 Q. And since you received the Subpoena, have</p>	<p style="text-align: right;">Page 105</p> <p>1 A. ABU HBDA</p> <p>2 this office in Canada, which we've been discussing,</p> <p>3 to which you authorized notarization of</p> <p>4 documentation you submit to the Palestinian</p> <p>5 Authority?</p> <p>6 A. No.</p> <p>7 Q. Okay. To your knowledge -- well, let me</p> <p>8 withdraw that. Start again.</p> <p>9 The question I'm about to ask you is based</p> <p>10 on your personal knowledge. To your personal</p> <p>11 knowledge and, you know, in advance of today, was</p> <p>12 any person who you understand to be an agent, or an</p> <p>13 employee, or an officer, or somehow affiliated with</p> <p>14 the Palestinian Liberation Organization, aware of</p> <p>15 you were being served with a subpoena?</p> <p>16 A. I haven't told anybody about that, no.</p> <p>17 Q. Okay. But to your --</p> <p>18 Putting aside whether you told anybody or</p> <p>19 not, to your knowledge, are any such people aware</p> <p>20 of?</p> <p>21 A. How would I know? I haven't spoken with</p> <p>22 anybody.</p> <p>23 Q. So --</p> <p>24 A. But I don't know. How would I know if</p> <p>25 anybody knows?</p>

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1 A. ABU HBDA

2 Q. To your knowledge, you're not aware of

3 that? That's all I'm asking.

4 A. I don't know. I don't know anything.

5 Q. Okay. And to your knowledge, again, just

6 your personal knowledge, and in advance of today,

7 was any person who you understand to be an agent, or

8 an employee, or an officer, or otherwise affiliated

9 with the Palestinian Authority aware of the Subpoena

10 that was served on you in connection with today's

11 deposition?

12 A. No, I don't know. I don't know.

13 Q. So, the answer is -- I mean, I just want

14 to confirm that I understood correctly.

15 To your knowledge, you are not aware of

16 any such person being knowledgeable about the fact

17 that you were served with the Subpoena?

18 A. For me, I didn't tell anybody.

19 Q. Right. But that, again, I just want to be

20 clear; you're not aware of any such person knowing

21 whether you told them or not?

22 A. God only knows. Am I God? I don't know.

23 How would I know.

24 Q. Okay. And one last question in this line.

25 To your knowledge, in advance of today, was any

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1 A. ABU HBDA

2 person who is an employee, or agent, or officer, or

3 otherwise affiliated with this office in Canada that

4 we've been talking about, where you submit documents

5 for, you know, certification or authentication of

6 documents by the Palestinian Liberation Authority,

7 were any of those people, to your knowledge, aware

8 that you were served with the Subpoena?

9 A. I don't know.

10 Q. Okay. Not -- so, to your knowledge, the

11 answer is no; is that correct?

12 A. I don't know. I don't know anything. I

13 don't know.

14 Q. Okay. By the way, your business -- let's

15 go to the last page of Exhibit -- I guess this is

16 Exhibit 4.

17 MR. SINAICO: Cosette, can we zoom in on

18 the thumbtack, please? There we go. Let's zoom

19 in on that.

20 Q. Mr. Abu Hbda, do you see the thumbtack

21 that we zoomed in on here on Exhibit 4?

22 A. Yes, sir.

23 Q. Okay. And you see there's an address

24 there, 964 Main Street, in Paterson, New Jersey?

25 A. Yes.

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1 A. ABU HBDA

2 Q. And what is that address?

3 A. This is my address.

4 Q. Your address. Is that a home address?

5 A. No.

6 Q. Okay. What kind of an address is that?

7 Is that the address where your business is located?

8 A. Yes, this is the office; yes.

9 Q. Okay. How long has the office of your

10 business been at that location?

11 A. I don't remember exactly, maybe two years.

12 I don't remember exactly.

13 Q. All right.

14 MR. SINAICO: Cosette, can we get Exhibit

15 5 again, please? I think that was Tab 10.

16 MS. VINCENT: Tab 10.

17 MR. SINAICO: But, I think we marked it as

18 Exhibit 5.

19 MS. VINCENT: So, which page?

20 MR. SINAICO: So, we're going to go to

21 Page 36 of the PDF. Actually, it has a number in

22 the lower right-hand; 296.

23 MS. VINCENT: Maybe it should be up.

24 MR. SINAICO: Yeah, that looks right. Can

25 we zoom?

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1 A. ABU HBDA

2 Actually, let me ask Mr. Abu Hbda.

3 Q. Have you seen this page before? Do you

4 recognize it? Anything you want to see, let us

5 know, and we could move the pages around for you.

6 Whatever you'd like us to do, we'll do.

7 A. No, I haven't seen it.

8 Q. Okay.

9 MR. SINAICO: Cosette, can you zoom in the

10 upper left-hand logo in the corner.

11 Q. Do you see the logo, Mr. Abu Hbda?

12 A. Yeah.

13 Q. Okay. Do you see it says, "PLO General

14 Delegations to the United States"?

15 MR. SINAICO: Can we make it any larger?

16 I know it's -- I'm having a hard time seeing it

17 to. There we go. Might be better.

18 Q. Does that make it easier? Can you see the

19 logo, Mr. Abu Hbda?

20 A. Why.

21 Q. Do you see that it says, "General

22 Delegation to the United States"?

23 A. Yes.

24 Q. Do you have an understanding of what the

25 PLO General Delegation to the United States is or

<p style="text-align: right;">Page 110</p> <p>1 A. ABU HBDA</p> <p>2 was?</p> <p>3 A. Yes.</p> <p>4 Q. And what do you understand that the PLO</p> <p>5 General Delegations of the United States is or was?</p> <p>6 A. It is a representative of Palestinian</p> <p>7 Authority.</p> <p>8 Q. Okay. And is that an analogue, or a</p> <p>9 former analogue in the United States to the office</p> <p>10 in Canada that we've been talking about?</p> <p>11 A. I don't know because I've never seen this</p> <p>12 page. This is the first time I've seen it.</p> <p>13 Q. Okay. But putting aside the web page, and</p> <p>14 whether you've seen it or not, do you have -- were</p> <p>15 you aware of what the general PLO delegation to the</p> <p>16 United States was?</p> <p>17 A. It used to have the Palestinian Authority</p> <p>18 for the documents and papers.</p> <p>19 Q. Right.</p> <p>20 A. Something --</p> <p>21 Q. And in that respect, did this office</p> <p>22 perform a bunch in -- similar to the one that is</p> <p>23 performed by this office in Canada that you deal</p> <p>24 with on behalf of your clients, who are looking to</p> <p>25 have documents legalized or certified by the</p>	<p style="text-align: right;">Page 112</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. And you see that the box in the</p> <p>4 upper left-hand corner says, "General Powers of</p> <p>5 Attorneys"; do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. That's a service that is also provided by</p> <p>8 Awni Abu Hbda Documentation Services, correct?</p> <p>9 A. I notarize it as a -- as a notary; yes.</p> <p>10 Q. Okay. And you see in the -- in the center</p> <p>11 on the top there, it says, "Durable Land Power of</p> <p>12 Attorney"; do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And that's also a service that Awni Abu</p> <p>15 Hbda Documentation Services provides in connection</p> <p>16 with the Palestinian Authority, correct?</p> <p>17 A. I do it -- I notarize it as a notary</p> <p>18 public; yes.</p> <p>19 Q. Okay.</p> <p>20 MR. SINAICO: Cosette, let's go to Page --</p> <p>21 I guess it's Page 42 of the PDF.</p> <p>22 MS. VINCENT: Sure; sure thing.</p> <p>23 Q. Mr. Abu Hbda, this -- just to be clear,</p> <p>24 this is another page of the Exhibit that we have</p> <p>25 been looking at.</p>
<p style="text-align: right;">Page 111</p> <p>1 A. ABU HBDA</p> <p>2 Palestinian Authority?</p> <p>3 A. Yes, they were authenticating the papers,</p> <p>4 notarizing the paper; yes.</p> <p>5 Q. And while that office was in existence,</p> <p>6 was it part of your business at Awni Abu Hbda</p> <p>7 Documentation Services for certifications or</p> <p>8 legalization of this office PLO General Delegation</p> <p>9 to the United States?</p> <p>10 A. Most of the people from New Jersey, and</p> <p>11 New Jersey when we used to notarize the papers, they</p> <p>12 go by themselves; they go in person to that office.</p> <p>13 Q. I'm not sure I understand that exactly.</p> <p>14 Do you mean they would go to the office, PLO General</p> <p>15 Delegation to the United States?</p> <p>16 A. Yes, sir; yes.</p> <p>17 Q. Okay.</p> <p>18 MR. SINAICO: Cosette, let's zoom out.</p> <p>19 Okay.</p> <p>20 Q. Do you see this page is titled, "Conular</p> <p>21 Affairs"?</p> <p>22 A. Yes.</p> <p>23 Q. When you see underneath that on the</p> <p>24 upper -- there are one, two, three and four, five,</p> <p>25 six boxes there; do you see that?</p>	<p style="text-align: right;">Page 113</p> <p>1 A. ABU HBDA</p> <p>2 A. I see that was Page 42, correct?</p> <p>3 MR. SINAICO: It's Page 42 of the PDF; 42</p> <p>4 out of 55; correct, Cosette?</p> <p>5 MS. VINCENT: It should be shared.</p> <p>6 MR. SINAICO: That's it.</p> <p>7 Q. Okay. Mr. Abu Hbda, do you see that page</p> <p>8 that's got, "A302," in the lower right-hand corner?</p> <p>9 A. Yes.</p> <p>10 Q. And you see it says, "Notary Publics"?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And do you see that -- I guess it</p> <p>13 says, "Notary Publics," in the upper left-hand logo?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And then it says, "Notary Publics,"</p> <p>16 again in the middle of the page. I guess -- there's</p> <p>17 a paragraph, and then to the right, it says, "Notary</p> <p>18 Publics," again; can you see that?</p> <p>19 MR. SINAICO: Sorry. Can we enlarge that</p> <p>20 for Mr. Abu Hbda?</p> <p>21 Q. Does that help? Okay. And do you see</p> <p>22 that there are a number of cities listed there?</p> <p>23 Okay. And do you see that one of them is</p> <p>24 Paterson?</p> <p>25 A. Yes, I see it.</p>

<p style="text-align: right;">Page 114</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay.</p> <p>3 MR. SINAICO: Let's move to Page 8038.</p> <p>4 It's a few more pages in. And let's zoom in</p> <p>5 again, so that Mr. Abu Hbda can see better, so</p> <p>6 that I can see better; my eyes are terrible, also.</p> <p>7 Q. Do you see that that's your name there,</p> <p>8 sir?</p> <p>9 A. Yes.</p> <p>10 MR. SINAICO: He understands the</p> <p>11 questions, which is terrific.</p> <p>12 Q. And do you see there's some letters there</p> <p>13 in a foreign letter, which I unfortunately don't</p> <p>14 understand, but do you see next to your name,</p> <p>15 there's some foreign letters there?</p> <p>16 A. Yes.</p> <p>17 Q. And can you tell us what that is?</p> <p>18 A. It's my name, "Abu Hbda."</p> <p>19 Q. That's your name in Arabic?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And underneath that, it says "388."</p> <p>22 By the way, do you understand that that's a</p> <p>23 reference to you?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And do you see underneath it, it</p>	<p style="text-align: right;">Page 116</p> <p>1 A. ABU HBDA</p> <p>2 the embassy, and they know, they saw my name coming</p> <p>3 on these papers, and they called me, and they asked</p> <p>4 me, and I said I agree.</p> <p>5 Q. And who was it that called you, if you</p> <p>6 remember?</p> <p>7 A. I don't remember exactly, but I think</p> <p>8 someone was working there. His name is Hakim.</p> <p>9 Q. Okay. Do you know what Hakim's role was</p> <p>10 in that office?</p> <p>11 THE INTERPRETER: I'm sorry, can you</p> <p>12 repeat the question, sir?</p> <p>13 MR. SINAICO: Sure.</p> <p>14 Q. Do you know what Hakim's role was in the</p> <p>15 office? And by that I mean, the General Delegation</p> <p>16 of the United States?</p> <p>17 A. No, I know that he was working there;</p> <p>18 that's it.</p> <p>19 Q. Okay. Apart from --</p> <p>20 Do you remember what Hakim told you in</p> <p>21 this conversation that you had with him and what you</p> <p>22 said to him?</p> <p>23 A. He asked me if they could put my name on</p> <p>24 the Website to notarize the papers that they</p> <p>25 authenticated.</p>
<p style="text-align: right;">Page 115</p> <p>1 A. ABU HBDA</p> <p>2 says, "388 Lake View Avenue, Clifton, New Jersey?"</p> <p>3 A. Yes.</p> <p>4 Q. And what is that address?</p> <p>5 A. This is my office address. I had an</p> <p>6 office at that place in the past.</p> <p>7 Q. Understood. And do you still have an</p> <p>8 office there?</p> <p>9 A. No.</p> <p>10 Q. Okay. Underneath that, there's a</p> <p>11 telephone number. Do you see the telephone number?</p> <p>12 I think it's a telephone number.</p> <p>13 A. Yes.</p> <p>14 Q. And is that a telephone number that you</p> <p>15 used for your business?</p> <p>16 A. This is my personal cell phone.</p> <p>17 Q. Personal cell phone. Got it. So, let me</p> <p>18 ask a question; do you have an understanding as to</p> <p>19 how your name came to be placed on a Website of the</p> <p>20 PLO Delegation to the United States, General</p> <p>21 Delegation to the United States?</p> <p>22 A. Yes, I know.</p> <p>23 Q. And can you explain for the Court how that</p> <p>24 happened?</p> <p>25 A. So, I used to notarize papers that goes to</p>	<p style="text-align: right;">Page 117</p> <p>1 A. ABU HBDA</p> <p>2 Q. And do you remember anything that you said</p> <p>3 to Hakim during the call?</p> <p>4 A. Yes, I told him, "yes, I agree."</p> <p>5 Q. And do you remember anything else about</p> <p>6 this telephone call that you had with Hakim?</p> <p>7 A. No.</p> <p>8 Q. And do you remember any other</p> <p>9 communications that you had with Hakim, apart from</p> <p>10 this telephone call that you described?</p> <p>11 A. So, if papers are delayed, or if we have a</p> <p>12 question, we used to call him to inquire about</p> <p>13 the -- just the question.</p> <p>14 Q. So, he was a contact of yours at the PLO</p> <p>15 General Delegations of the United States when that</p> <p>16 office was open, correct?</p> <p>17 A. This is the person that I knew -- all -- I</p> <p>18 knew his name there.</p> <p>19 Q. Did you ever meet him in person?</p> <p>20 MR. SINAICO: Just let the record reflect</p> <p>21 that Mr. --</p> <p>22 A. I've never met Hakim in my life. I only</p> <p>23 saw Hakim on TV.</p> <p>24 MR. SINAICO: Let the record reflect that</p> <p>25 before Mr. -- you know, before the translator</p>

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<p style="text-align: right;">Page 118</p> <p>1 A. ABU HBDA</p> <p>2 translated that answer, Mr. Abu Hbda had provided</p> <p>3 the answer to the question.</p> <p>4 Q. Okay. Apart from Hakim, did you ever</p> <p>5 communicate with any other person who worked at the</p> <p>6 office of the PLO General Delegations of the United</p> <p>7 States?</p> <p>8 A. There was another person, his name was</p> <p>9 Dr. Omar. He was the, you know, legal</p> <p>10 representative there, and we used to ask him</p> <p>11 questions; the same thing we were doing with Hakim.</p> <p>12 Q. Okay. Apart from Hakim and Dr. Omar, did</p> <p>13 you ever communicate with anybody else who worked at</p> <p>14 the PLO General Delegation to the United States?</p> <p>15 A. I don't remember speaking with anyone</p> <p>16 else; no.</p> <p>17 Q. How many times would you say you've</p> <p>18 communicated with Dr. Omar?</p> <p>19 A. I don't remember; maybe once, twice. I</p> <p>20 don't know. I don't remember.</p> <p>21 Q. When was the last time you spoke with</p> <p>22 Hakim, the individual we mentioned a few minutes</p> <p>23 ago?</p> <p>24 A. After they closed the -- cancel it. I</p> <p>25 don't know anything about what happened after.</p>	<p style="text-align: right;">Page 120</p> <p>1 A. ABU HBDA</p> <p>2 of Paterson, and I know we looked, that that's a</p> <p>3 large honorary role, and I want to know if you had</p> <p>4 any honorary delegations that might have been given</p> <p>5 to you at the PLO General Delegation of the United</p> <p>6 States?</p> <p>7 A. No, there isn't.</p> <p>8 MR. SINAIKO: Cosette, can we bring up</p> <p>9 Exhibit 12, please, and we're going to mark this</p> <p>10 as Exhibit 6.</p> <p>11 (Whereupon, Subpoena to Produce was marked as</p> <p>12 Exhibit 6 for identification, as of April 7th,</p> <p>13 2021.)</p> <p>14 MR. SINAIKO: I'll ask the court reporter</p> <p>15 to mark it, Subpoena to Produce Documents,</p> <p>16 Information, or Objects, or to Permit Inspections</p> <p>17 of Premises in Civil Action.</p> <p>18 Q. My question to you, Mr. Abu Hbda, feel</p> <p>19 free to take a look at the document, if you want to</p> <p>20 page through it. Cosette can help you with that.</p> <p>21 Just tell her what you'd like her to do.</p> <p>22 My question to you is, after you looked at</p> <p>23 the document, is whether you recognize it?</p> <p>24 A. Yes, I've seen it.</p> <p>25 Q. And what do you recognize this document to</p>
<p style="text-align: right;">Page 119</p> <p>1 A. ABU HBDA</p> <p>2 Q. And what about Dr. Omar? When was the</p> <p>3 last time you remember communicating with Dr. Omar?</p> <p>4 A. I don't know; maybe before they closed. I</p> <p>5 don't remember. I spoke with them either once or</p> <p>6 twice. I don't know.</p> <p>7 Q. Oh, you think --</p> <p>8 Just to be clear about that, you think you</p> <p>9 spoke to Dr. Omar only once or twice; is that</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. Okie doke. Did you ever receive</p> <p>13 compensation of any type from the PLO General</p> <p>14 Delegation to the United States?</p> <p>15 A. No.</p> <p>16 Q. Did you ever hold a title of any kind with</p> <p>17 the PLO General Delegation to the United States?</p> <p>18 A. No.</p> <p>19 Q. Not even an honorary title, like Deputy</p> <p>20 Mayor of Paterson, right?</p> <p>21 A. What is Paterson has to do with the -- it</p> <p>22 doesn't have any relation.</p> <p>23 Q. I'm just asking about honorary titles?</p> <p>24 A. No.</p> <p>25 Q. I know you were the Deputy Honorary Mayor</p>	<p style="text-align: right;">Page 121</p> <p>1 A. ABU HBDA</p> <p>2 be?</p> <p>3 A. This is the Subpoena that was sent to me.</p> <p>4 Q. Okay. Do you recognize this to be the</p> <p>5 Subpoena by which the Plaintiffs in this case asked</p> <p>6 you to produce documents?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Now, I know we mentioned this</p> <p>9 before, but I want to spend just a little bit more</p> <p>10 time on it because I think we'll be able to do that</p> <p>11 a little bit more effectively now than we could</p> <p>12 before. Can you tell me what steps you took to</p> <p>13 search for documents that might be responsive to the</p> <p>14 Subpoena?</p> <p>15 A. So, I searched in my emails, and I</p> <p>16 searched in the files, if I have documents about</p> <p>17 anything, but, usually, we don't keep files.</p> <p>18 Q. Okay. And are these your personal files,</p> <p>19 sir?</p> <p>20 THE INTERPRETER: I'm sorry, this is the</p> <p>21 interpreter. The client is -- he is massaging his</p> <p>22 eyes.</p> <p>23 MR. SINAIKO: Is everybody okay? Do we</p> <p>24 need to take a short break.</p> <p>25 THE INTERPRETER: Okay.</p>

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<p style="text-align: right;">Page 122</p> <p>1 A. ABU HBDA</p> <p>2 MR. SINAICO: Because, like I said at the</p> <p>3 beginning, we could take a break any time you need</p> <p>4 to, sir.</p> <p>5 THE INTERPRETER: No, you can continue,</p> <p>6 sir.</p> <p>7 MR. SINAICO: Thank you very much.</p> <p>8 Q. I'm going to try to wind this up as</p> <p>9 quickly as I can. I think we're actually getting</p> <p>10 close to the end. The files that you searched for</p> <p>11 documents that might be responsive to the Subpoenas,</p> <p>12 were those your personal files?</p> <p>13 A. The files I have in my office.</p> <p>14 Q. Those are the files at the offices of Awni</p> <p>15 Abu Hbda Documentation Services in Paterson?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Do you have personal files at home</p> <p>18 that might possibly contain documents responsive to</p> <p>19 the Subpoena?</p> <p>20 A. No.</p> <p>21 Q. Okay. And the emails that you searched,</p> <p>22 where were those -- in what account were those</p> <p>23 emails?</p> <p>24 A. My email.</p> <p>25 Q. Your personal email, sir?</p>	<p style="text-align: right;">Page 124</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. And when did you stop providing</p> <p>3 those services?</p> <p>4 A. I don't remember. In the 90's. I don't</p> <p>5 know.</p> <p>6 Q. And, generally, what was the nature of</p> <p>7 those services?</p> <p>8 A. Paying taxes; something like that.</p> <p>9 Q. All right.</p> <p>10 MR. SINAICO: Cosette, let's bring up --</p> <p>11 Okay. Let's go to Tab 13, please, and</p> <p>12 let's mark this as our next exhibit. Is this</p> <p>13 Exhibit 7?</p> <p>14 (Whereupon, Tab 13 was marked as Exhibit 7</p> <p>15 for identification, as of April 7th, 2021.)</p> <p>16 MS. VINCENT: It should be Exhibit 11.</p> <p>17 MR. SINAICO: So, in a letter dated</p> <p>18 April 5, 2021, from Sara Kropf to myself, and my</p> <p>19 partner, Ron Wick.</p> <p>20 Q. I'll ask you, Mr. Abu Hbda, after you've</p> <p>21 had a chance to look at the document, have you seen</p> <p>22 it before?</p> <p>23 A. I think. Ask me to look into my records.</p> <p>24 I'm not sure whether I've seen this document or not.</p> <p>25 Q. Okay. But you see that the second</p>
<p style="text-align: right;">Page 123</p> <p>1 A. ABU HBDA</p> <p>2 A. I have only one email.</p> <p>3 Q. And that's an email account that you use</p> <p>4 for both personal and -- personal and business?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And just to be clear, and I'm just</p> <p>7 getting this off of one of the Exhibits that I</p> <p>8 mentioned, and I could show you the Exhibit if you</p> <p>9 like, but just to confirm, the email is</p> <p>10 redm@gmail.com; is that correct?</p> <p>11 A. Good.</p> <p>12 Q. And that email account, is that the only</p> <p>13 email account that's used for the business of Awni</p> <p>14 Abu Hbda Documentation Services?</p> <p>15 A. Yes, sir.</p> <p>16 Q. By the way, sir, apart from -- apart from</p> <p>17 you, personally, does any other person work for Awni</p> <p>18 Abu Hbda Documentation Services; do you have any</p> <p>19 other employees?</p> <p>20 A. I work by myself.</p> <p>21 Q. Okay. And, again, just to close off an</p> <p>22 open spot, you had mentioned before that you perform</p> <p>23 accounting services of some type; do you recall</p> <p>24 that?</p> <p>25 A. This was in the past, yes.</p>	<p style="text-align: right;">Page 125</p> <p>1 A. ABU HBDA</p> <p>2 sentence of the first paragraph of the letter says,</p> <p>3 "Mr. Abu Hbda has searched his records for documents</p> <p>4 in response to your Subpoena"; do you see that?</p> <p>5 A. Yes, sir.</p> <p>6 Q. And you see that at the top of the page it</p> <p>7 says, "April 5, 2021"; do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And so I think you had mentioned</p> <p>10 before that you conducted a search of emails and</p> <p>11 files; did you do that work, prior to April 5, 2021?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And did you conduct any searches</p> <p>14 for documents after April 5, 2021?</p> <p>15 A. I don't know. Maybe yesterday I saw</p> <p>16 something. I don't remember, to be honest.</p> <p>17 Q. Okay. Let's look at the third sentence of</p> <p>18 the first paragraph of this letter. In this</p> <p>19 sentence, Ms. Kropf tells my partner Mr. Wick and me</p> <p>20 that you did not have any documents responsive to</p> <p>21 the Subpoena; do you see that, sir?</p> <p>22 A. Exactly.</p> <p>23 Q. Right. And, in fact, ultimately, you did</p> <p>24 locate some documents that were responsive to the</p> <p>25 Subpoena; is that correct, sir?</p>

<p style="text-align: right;">Page 126</p> <p>1 A. ABU HBDA</p> <p>2 A. I don't know what you mean by that. I</p> <p>3 don't know.</p> <p>4 Q. There came a time, sir, did there not,</p> <p>5 where you provided some documents that were produced</p> <p>6 to the Plaintiffs, pursuant to the Subpoena in this</p> <p>7 case; isn't that right?</p> <p>8 A. One paper, maybe.</p> <p>9 Q. Okay. And do you recall how you came to</p> <p>10 locate that document?</p> <p>11 A. I continued searching in the papers I</p> <p>12 have, so I found this paper.</p> <p>13 Q. Okay. Is there any other searching that</p> <p>14 you feel you could do to locate additional documents</p> <p>15 responsive to the Plaintiff's Subpoena?</p> <p>16 A. If I find something, I will tell my</p> <p>17 attorney immediately about it, but I don't have</p> <p>18 anything else.</p> <p>19 Q. Right. And how did you -- well, let me</p> <p>20 ask you this.</p> <p>21 Before Ms. Kropf sent this letter to my</p> <p>22 partner, Mr. Wick and me, do you believe that you</p> <p>23 thoroughly searched your records for documents that</p> <p>24 might be responsive to the Subpoena?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 128</p> <p>1 A. ABU HBDA</p> <p>2 entitled, "Contract for Notary Public Services."</p> <p>3 This will be Exhibit 8.</p> <p>4 Q. Mr. Abu Hbda, do you have Exhibit 8 in</p> <p>5 front of you?</p> <p>6 A. Yes. Yes.</p> <p>7 Q. Okay. All right. And you see that --</p> <p>8 This is a document -- obviously, you've</p> <p>9 seen before because you supplied it to your attorney</p> <p>10 who, in turn, supplied it to us recently; is that</p> <p>11 correct?</p> <p>12 A. Yeah.</p> <p>13 Q. And where was this document physically</p> <p>14 located when you found it?</p> <p>15 A. One of the drawers.</p> <p>16 Q. Okay. Was that a drawer in your office in</p> <p>17 Paterson, or was that a drawer at home, or where was</p> <p>18 the drawer located?</p> <p>19 A. In Paterson.</p> <p>20 Q. Okay. And can you tell us what this</p> <p>21 document is.</p> <p>22 A. This is the contract of the Palestinian</p> <p>23 Mission. They sent it to me, but I never signed it.</p> <p>24 I never sent it back to them.</p> <p>25 Q. I see. So, this is -- you don't --</p>
<p style="text-align: right;">Page 127</p> <p>1 A. ABU HBDA</p> <p>2 Q. And how did you conclude that there might</p> <p>3 be additional documents you still needed to look</p> <p>4 for, if you did conclude that?</p> <p>5 A. To be honest, I don't know. I just</p> <p>6 looked, and I searched in the papers, and I saw</p> <p>7 these papers among the -- among the papers.</p> <p>8 Q. I see. And what did you do after you saw</p> <p>9 that piece of paper?</p> <p>10 A. I sent -- I sent it to my attorney.</p> <p>11 Q. And when did you do that, if you remember?</p> <p>12 A. Yesterday. Maybe yesterday. I don't</p> <p>13 know. I think yesterday.</p> <p>14 Q. All right.</p> <p>15 MR. SINAICO: Cosette, if we could bring</p> <p>16 up Tab 15.</p> <p>17 MS. VINCENT: Okay.</p> <p>18 MR. SINAICO: And let's mark this as our</p> <p>19 next Exhibit. Let's -- this is going to be</p> <p>20 Exhibit 8.</p> <p>21 (Whereupon, Tab 15 was marked as Exhibit 8</p> <p>22 for identification, as of April 7th, 2021.)</p> <p>23 MR. SINAICO: It's a document that has</p> <p>24 a -- the logo at the top and heading that says,</p> <p>25 "General Delegation PLO United States," and is</p>	<p style="text-align: right;">Page 129</p> <p>1 A. ABU HBDA</p> <p>2 This is a contract that you never actually</p> <p>3 entered into?</p> <p>4 A. No, no. I -- I refused it. I refused.</p> <p>5 Q. Well, maybe you could tell me --</p> <p>6 withdrawn.</p> <p>7 How did you come to receive this piece of</p> <p>8 paper?</p> <p>9 A. I don't know. Maybe it's with one of the</p> <p>10 notarized papers we sent them, they sent with them</p> <p>11 back to us. I don't remember at all. I don't</p> <p>12 remember at all how I got it.</p> <p>13 Q. Do you recall when you received this piece</p> <p>14 of paper?</p> <p>15 A. Maybe in 2014, around that time.</p> <p>16 Q. Okay. And you see there's some</p> <p>17 handwriting filled into the document in the middle</p> <p>18 of the first page?</p> <p>19 A. Yes.</p> <p>20 Q. Whose handwriting is that?</p> <p>21 A. This is my handwriting.</p> <p>22 Q. Okay. And that's your name, and your</p> <p>23 business address that -- that is written in your</p> <p>24 handwriting on the first page of Exhibit 8, correct?</p> <p>25 A. Correct.</p>

<p style="text-align: right;">Page 130</p> <p>A. ABU HBDA</p> <p>Q. Okay. And this is a piece of paper that was -- strike that.</p> <p>Do you recall ever requesting that this document be sent to you?</p> <p>A. No.</p> <p>Q. So, as far as you know, this document was gratuitously sent to you by the General Delegation of the PLO to the United States, correct?</p> <p>A. Yes.</p> <p>Q. And I'm going to turn you to Page 3 of the document.</p> <p>MR. SINAICO: Cosette, if we could just move over there. Can we zoom in on the name that's in the middle of the page? Do you see what I'm talking about there? Perfect. It's a little hard to read because the quality of the copy is not very high.</p> <p>Q. This is what we got from your counsel. Do you see there's a name there Maen Areikat; M-A-E-N; A-R-E-I-K-A-T?</p> <p>A. Yes.</p> <p>Q. And do you know who that is?</p> <p>A. He's the Ambassador of the Commission.</p> <p>Q. Have you ever communicated in, orally or</p>	<p style="text-align: right;">Page 132</p> <p>A. ABU HBDA</p> <p>A. All people go to see these sessions, or the meetings. It's -- I did it the same as any member of the public.</p> <p>Q. So, you were present just as a member of the public, correct?</p> <p>A. Yes.</p> <p>Q. Apart from the visit to the United Nations where you saw Maen Areikat, have you ever been a member of the United Nations at that time?</p> <p>A. I take my children and grandchildren often, every two or three years, to show them from the outside the United Nations. So, I take them, my grandchildren, just to show them.</p> <p>Q. Okay.</p> <p>MR. SINAICO: Looking at -- let's -- let's zoom out again, please, Cosette.</p> <p>Q. Looking at Exhibit 8, can you point me to any trade secret that's reflected in that document?</p> <p>THE INTERPRETER: Sorry. Could you repeat the question again? This is the interpreter.</p> <p>MR. SINAICO: Certainly.</p> <p>Q. Looking at Exhibit 8, Mr. Abu Hbda, can you point me to any trade secret in that document?</p> <p>A. What is it that you're referring to</p>
<p style="text-align: right;">Page 131</p> <p>A. ABU HBDA</p> <p>in writing, with that person?</p> <p>A. I saw him once, and I had a meeting, and I went, and he wasn't -- I -- it was a session, and he was there, but I've never spoken with him. I've never wrote him anything.</p> <p>Q. Is that a session of the UN that you personally attended?</p> <p>A. It's the session of the United Nations. All representative comes. It happens always.</p> <p>Q. So, are you talking about a General Assembly of the UN meeting, sir?</p> <p>A. Yeah. Yes.</p> <p>Q. Was that something that you watched in person or were you present?</p> <p>A. I went to the one follow-up visit and it was present there.</p> <p>Q. I see. So, did you actually interact with Maen Areikat, or was it just somebody who you saw?</p> <p>A. I never spoke or interacted with him.</p> <p>Q. Okay. So, it was just somebody who you saw at the United Nations during a visit there?</p> <p>A. Yes, I've only seen him; yes.</p> <p>Q. And why were you present at the United Nations at that time?</p>	<p style="text-align: right;">Page 133</p> <p>A. ABU HBDA</p> <p>exactly?</p> <p>Q. Well, let me put it a little differently. Mr. Abu Hbda, do you see any information in this document that you regard as reflecting a secret that you use in your business, secret information that you use in your business?</p> <p>A. I never signed this document. So, what is the content? What is inside? It doesn't belong to me. It's -- it doesn't belong to me. I didn't sign it.</p> <p>Q. So, would you agree then that this document does not reflect any secret or confidential information concerning your business?</p> <p>A. This document is not related to me. I don't have any relation whatsoever to this document.</p> <p>Q. Right. So, my question is, would you agree that this document does not reflect any secret or confidential information concerning your business?</p> <p>A. I don't understand your question, and I cannot answer this question because it's not related to me.</p> <p>Q. Okay. So, can we agree that this -- that this document does not reflect any information at</p>

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1 A. ABU HBDA

2 all about the business that you run, that is Awni

3 Abu Hbda Documentation Services?

4 A. I don't understand your question, or what

5 you are referring to.

6 Q. Okay. What I'm trying to understand,

7 Mr. Abu Hbda, is whether this document contains any

8 information about your business, Awni Abu Hbda

9 Documentation Services?

10 A. Again, this is concerning -- this document

11 is regarding documentation services, but I haven't

12 signed it. I didn't sign it, or do anything with

13 it.

14 Q. When you received this document from --

15 from the PLO General Delegation to the United

16 States, did anybody ask you to keep the document

17 confidential?

18 A. No. Nobody asked me about that.

19 Q. And does this document reflect any

20 financial information about you or about Awni Abu

21 Hbda Documentation Services?

22 A. No.

23 Q. Okay. And do you regard this document as

24 containing information of a personal nature about

25 anyone else or you?

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1 A. ABU HBDA

2 A. It has my name and my address; that's all.

3 Q. Right. And do you regard that

4 information -- well, withdrawn.

5 Do you regard that name and business

6 address as personal or intimate information about

7 you?

8 A. It's a business information.

9 Q. Okay. But publicly available business

10 information, correct?

11 A. Maybe.

12 Q. Well, it's on your Website; isn't it, sir?

13 A. Yes, that's possible.

14 Q. With your name and telephone --

15 It's possible. Should we go back and look

16 at the Website again? Would you like me to look at

17 the Website again, sir?

18 A. I told you. This is a business

19 information that is available on the Website.

20 Q. Okay. Perfect. And this document -- I'm

21 going to just come back to one or two other things.

22 This document that we've marked as, I think it's

23 Exhibit 8.

24 MR. SINAICO: Is it 8? Are we on Exhibit

25 8, Cosette? I think it is Exhibit 8.

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1 A. ABU HBDA

2 MS. VINCENT: Yeah, it's Exhibit 8.

3 Q. This document that we marked, Exhibit 8,

4 do you regard this document as containing personal

5 or intimate information about any person?

6 A. No.

7 Q. And do you regard this document as

8 containing personal or intimate information about

9 any person?

10 A. What do you mean by, "personal"? Are you

11 referring to me or any person?

12 Q. Any person. We already established that

13 the document pertaining to you is the information

14 you make available on your Website. What I'm asking

15 you is, do you regard this document as containing

16 information of a personal or intimate nature of you

17 or any person?

18 A. I don't know anything about this document,

19 and I cannot answer anything regarding it.

20 MR. SINAICO: Okay. Let's go to Tab 11,

21 and we'll mark this as Exhibit 9.

22 (Whereupon, Tab 11 was marked as Exhibit 9

23 for identification, as of April 7th, 2021.)

24 MR. SINAICO: Can we zoom in just a little

25 bit, Cosette? Just to make it a little more

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1 A. ABU HBDA

2 legible. So, this is a document that we obtained

3 from the Internet, from the Website of the

4 permanent observer Palestine to the United Nations

5 of New York. It's an excerpt from the Website,

6 and I would ask the court reporter to mark it as

7 Deposition Exhibit 9.

8 Q. Okay. I just have a few questions about

9 this one. Mr. Abu Hbda, do you see that there's a

10 list of names in the middle of the page here? Let's

11 zoom in a little bit. It's testing everybody's eyes

12 here. It's hard to see. Can you see that better?

13 A. Yes.

14 Q. Okay. Can you see that the first name is

15 Riyadh Mansour?

16 A. Yes.

17 Q. And do you know that person?

18 A. You know.

19 Q. How do you know that person?

20 A. I see him in the UN. He comes sometimes

21 for meetings. He participates with people's

22 concerns. If someone dies, if there is a, like some

23 incidents, or if there's a celebration, he comes to

24 celebrate with us involved in the community.

25 Q. How many times would you say you've met

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<p>1 A. ABU HBDA</p> <p>2 Mr. Mansour?</p> <p>3 A. I've never had a special meeting with him</p> <p>4 in my life. I never sat with him. I see him. I</p> <p>5 shake hands with him, like other people do.</p> <p>6 Q. Okay. Apart from seeing him, and shaking</p> <p>7 hands with him, have you ever had a substantive</p> <p>8 communication with him, beyond pleasantries?</p> <p>9 A. Maybe we speak when there is a</p> <p>10 celebration, there is a funeral, there is a wedding,</p> <p>11 there is a dinner. So, just in general speaking, we</p> <p>12 don't discuss politics; that's general speaking.</p> <p>13 He's a public figure. Everybody knows him.</p> <p>14 Q. Okay. But your interactions with him,</p> <p>15 Mr. Abu Hbda -- let me withdraw that.</p> <p>16 Mr. Abu Hbda, do you have interactions, or</p> <p>17 have you ever had interactions with Mr. Mansour,</p> <p>18 other than, you know, of a social nature?</p> <p>19 A. No.</p> <p>20 Q. Okay. Let's go to the next person Feda</p> <p>21 Abdelhady-Nasser; do you see that person's name?</p> <p>22 A. I don't know.</p> <p>23 Q. My question -- let me just get a clear</p> <p>24 question and answer. Do you know Feda</p> <p>25 Abdelhady-Nasser personally?</p>	<p>1 A. ABU HBDA</p> <p>2 Abushawesh; do you see that name, sir?</p> <p>3 A. Yes.</p> <p>4 Q. And have you ever met Abdallah Abushawesh?</p> <p>5 A. Yes.</p> <p>6 Q. You have, right? And who do you</p> <p>7 understand Abdallah Abushawesh to be?</p> <p>8 A. I don't know. He works in the UN, in the</p> <p>9 Mission. I don't know.</p> <p>10 Q. Would you say that you know Abdallah</p> <p>11 Abushawesh personally?</p> <p>12 A. No.</p> <p>13 Q. Have you ever communicated with Abdallah</p> <p>14 Abushawesh?</p> <p>15 A. I think I saw him once only in the UN, and</p> <p>16 I spoke with him once; that's it.</p> <p>17 Q. And what was the nature of the</p> <p>18 conversation, if you remember?</p> <p>19 A. "How are you? How is your family? How is</p> <p>20 your children?"</p> <p>21 Q. And were those questions that he was</p> <p>22 asking of you, or were those questions you were</p> <p>23 asking of him?</p> <p>24 A. We both asked the same questions.</p> <p>25 Q. I see. And where did this meeting happen?</p>
Page 139	Page 141
<p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 Q. Have you ever met Feda Abdelhady-Nasser?</p> <p>4 A. No.</p> <p>5 Q. To your knowledge, have you ever</p> <p>6 communicated with Feda Abdelhady-Nasser?</p> <p>7 A. No.</p> <p>8 Q. Okay. The next person down on the list</p> <p>9 Nadya Rasheed; have you ever seen that, Mr. Abu</p> <p>10 Hbda?</p> <p>11 A. Yes, I see her.</p> <p>12 Q. And have you ever met Nadya Rasheed?</p> <p>13 A. No.</p> <p>14 Q. And have you ever communicated with Nadya</p> <p>15 Rasheed?</p> <p>16 A. No.</p> <p>17 Q. Okay. Let's go to the next name on the</p> <p>18 list Majed Bamyia; do you see that name?</p> <p>19 A. Yes.</p> <p>20 Q. And have you ever Majed Bamyia?</p> <p>21 A. No.</p> <p>22 Q. And to your knowledge, have you ever</p> <p>23 communicated with Majed Bamyia?</p> <p>24 A. No.</p> <p>25 Q. Let's go to the next name, Abdallah</p>	<p>1 A. ABU HBDA</p> <p>2 A. In the -- it's in the UN.</p> <p>3 Q. And what was the context for you meeting</p> <p>4 Abdallah Abushawesh at the UN?</p> <p>5 THE INTERPRETER: I'm sorry. Interpreter.</p> <p>6 Could you repeat the question?</p> <p>7 MR. SINAIKO: Sure.</p> <p>8 Q. What was the context for you meeting</p> <p>9 Abdallah Abushawesh at the UN?</p> <p>10 A. There was no specific. He was there, and</p> <p>11 there was some people there, and I saw him.</p> <p>12 Q. Okay. And apart from this one</p> <p>13 communication that you recall, can you recall any</p> <p>14 other communications with Mr. Abdallah Abushawesh?</p> <p>15 A. No.</p> <p>16 Q. Okay. Let's go to the next name, Nada</p> <p>17 Tarbush; do you see that name there, sir?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Have you ever met Ms. Nada Tarbush?</p> <p>20 A. No.</p> <p>21 Q. Have you ever communicated with Nada</p> <p>22 Tarbush?</p> <p>23 A. No.</p> <p>24 Q. Okay. And let's go to the next name on</p> <p>25 the list. Can you see Ms. Sahar Abushawesh?</p>

<p style="text-align: right;">Page 142</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And have you ever met Ms. Sahar</p> <p>4 Abushawesh?</p> <p>5 A. No.</p> <p>6 Q. Have you ever communicated with Sahar</p> <p>7 Abushawesh?</p> <p>8 A. No.</p> <p>9 Q. Okay. Let's go down to the next one;</p> <p>10 Ms. Sahar Salam; do you see that name Sahar Salam?</p> <p>11 A. Yes, I saw the name, yes.</p> <p>12 Q. Okay. Have you ever met Sahar Salam?</p> <p>13 A. No.</p> <p>14 Q. Okay. And have you ever communicated with</p> <p>15 Ms. Sahar Salam?</p> <p>16 A. No.</p> <p>17 Q. Okay. And the last name on the list</p> <p>18 Ms. Nadia Ghannam; do you see that name?</p> <p>19 A. I see it, yes.</p> <p>20 Q. Okay. And have you ever met Ms. Nadia</p> <p>21 Ghannam?</p> <p>22 A. Her name is not strange to me, but I've</p> <p>23 never met her in person.</p> <p>24 Q. Right. And have you ever communicated</p> <p>25 with Nadia Ghannam?</p>	<p style="text-align: right;">Page 144</p> <p>1 A. ABU HBDA</p> <p>2 THE VIDEOGRAPHER: We are now back on the</p> <p>3 record. The time is 20:30 UTC Time.</p> <p>4 Q. Okay. Mr. Abu Hbda, I just have a few</p> <p>5 more questions for you today. Do you recall, sir,</p> <p>6 that we were looking at a list of notaries public</p> <p>7 that was maintained by the PLO General Delegation to</p> <p>8 the United States, a list that you were on?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And are you aware of any other</p> <p>11 lists of that nature, that is lists of notary</p> <p>12 publics in the United States that are -- that is</p> <p>13 currently maintained by the Palestinian Authority?</p> <p>14 A. I don't have any lists.</p> <p>15 Q. No, but were you aware of the existence of</p> <p>16 any such list?</p> <p>17 A. You can ask the Mission in Canada, the</p> <p>18 Embassy for me. I don't know.</p> <p>19 Q. Ah. So, just to come back to the</p> <p>20 question. Were you aware of the --</p> <p>21 Were you aware that that Palestinian</p> <p>22 Authority maintains any list of notaries in the</p> <p>23 United States, similar to the one we looked at from</p> <p>24 the former PLO General Delegation to the United</p> <p>25 States?</p>
<p style="text-align: right;">Page 143</p> <p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 MR. SINAICO: Let's move back up to to top</p> <p>4 of this page. Page -- Exhibit 9.</p> <p>5 Q. Have you -- I guess I'll try to limit the</p> <p>6 question to at any time during 2020 or 2021, and we</p> <p>7 could put aside the conversations with Mr. Mansour</p> <p>8 that you've already told us about, and the other</p> <p>9 conversations that you've already told us about, you</p> <p>10 know, in the last couple of minutes.</p> <p>11 Putting aside those conversations, do you</p> <p>12 recall, at any time in 2020 or 2021, having any</p> <p>13 communication with anybody that you understood to be</p> <p>14 an employee of, or an agent of, or affiliated with</p> <p>15 the permanent member of the State of Palestinian</p> <p>16 Mission in New York?</p> <p>17 A. No.</p> <p>18 MR. SINAICO: Alrighty. If we could -- I</p> <p>19 think I'm actually close to finished. If we could</p> <p>20 go off the record. I probably want 15 minutes to</p> <p>21 gather my notes, and I think we're very close to</p> <p>22 done. Would it be all right if we took a break?</p> <p>23 MS. KROPP: If we could do a little</p> <p>24 shorter than 15 minutes.</p> <p>25 (Whereupon, a short recess was taken.)</p>	<p style="text-align: right;">Page 145</p> <p>1 A. ABU HBDA</p> <p>2 A. You have to ask them themselves about</p> <p>3 this. For me, I don't know.</p> <p>4 Q. You don't know? I'm just trying to</p> <p>5 know --</p> <p>6 I'm just trying to confirm if you're aware</p> <p>7 of such a thing or not.</p> <p>8 A. I don't know. Maybe there is. I don't</p> <p>9 know about this.</p> <p>10 Q. So, you're unaware of any such list, just</p> <p>11 to be clear?</p> <p>12 A. I don't have a list or know, but maybe</p> <p>13 there is a list with names on it. I don't know.</p> <p>14 Q. Okay. And do you know whether any such</p> <p>15 list is maintained by the Palestinian Liberation</p> <p>16 Organization?</p> <p>17 A. Why don't you go and ask the PLO? Why --</p> <p>18 how would I know about that?</p> <p>19 Q. I'm just asking you, sir, if you could let</p> <p>20 us know if you're aware of any such ID, I'd be</p> <p>21 grateful.</p> <p>22 A. I don't know. I don't have a list. I</p> <p>23 know there's people who sign, but I don't have a</p> <p>24 list. I don't know.</p> <p>25 Q. Okay. And the office that you mentioned</p>

<p style="text-align: right;">Page 146</p> <p>1 A. ABU HBDA</p> <p>2 in Canada to which you send documents when you would</p> <p>3 like them legalized or certified by the Palestinian</p> <p>4 Authority, do you know where that office in Canada</p> <p>5 maintains such a list, just to your knowledge? I'm</p> <p>6 not asking whether they do or not. I'm asking if</p> <p>7 you know whether they do or not.</p> <p>8 MR. BERGER: I'm going to object to the</p> <p>9 form as misstating his prior testimony.</p> <p>10 But, you could answer.</p> <p>11 Q. Let me put the question again in a way</p> <p>12 that will hopefully not draw an objection. The</p> <p>13 office in Canada that we've been speaking about</p> <p>14 today; you know what I'm talking about, correct,</p> <p>15 sir?</p> <p>16 A. I know, but I don't know what the Mission,</p> <p>17 or the office in Canada knows, or keeps, or what</p> <p>18 they don't know. You could call them and ask them</p> <p>19 about that.</p> <p>20 Q. You're getting ahead of me a little bit.</p> <p>21 I'm first trying to make a clear record here. The</p> <p>22 office in Canada, remember we looked at the document</p> <p>23 that had the red stamp and the blue stamp on it?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And you remember that was the</p>	<p style="text-align: right;">Page 148</p> <p>1 A. ABU HBDA</p> <p>2 your business Awni Abu Hbda Documentation Services?</p> <p>3 A. No. The Authority or the government, they</p> <p>4 don't send anything to us. They haven't sent</p> <p>5 anything to us.</p> <p>6 Q. Okay. Were you aware whether at any time</p> <p>7 January 4, 2020, the Palestinian Liberation</p> <p>8 Organization has referred any customers or clients</p> <p>9 to your business Awni Abu Hbda Documentation</p> <p>10 Services?</p> <p>11 A. No, they haven't sent anything.</p> <p>12 Q. Okay. Are you aware whether this office</p> <p>13 in Canada that we've been talking about, the one</p> <p>14 which you sent the document with the red and blue</p> <p>15 stamp on it, were you aware whether that office,</p> <p>16 since January 2020, has referred any customers or</p> <p>17 clients to your business Awni Abu Hbda Documentation</p> <p>18 Services?</p> <p>19 Just looking at the realtime record, I</p> <p>20 want to be sure that my record reflects my question</p> <p>21 pertains to any referrals of customers or clients on</p> <p>22 or after January 4, 2020.</p> <p>23 A. No.</p> <p>24 Q. Okay. And are you aware whether the</p> <p>25 Permanent Observer Mission to the United Nations</p>
<p style="text-align: right;">Page 147</p> <p>1 A. ABU HBDA</p> <p>2 document that you sent to an office in Canada,</p> <p>3 correct?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And that office in Canada, were you</p> <p>6 aware of whether that office in Canada maintains a</p> <p>7 list of notary publics in the United States who can</p> <p>8 perform notarial services, and a list that we looked</p> <p>9 at before to the PLO General Delegation to the</p> <p>10 United States?</p> <p>11 A. I don't know. I know they had my name,</p> <p>12 but for other names, I don't know.</p> <p>13 Q. You know they have your name?</p> <p>14 A. They signed my paper, so they know my</p> <p>15 name.</p> <p>16 Q. Got it. Okay. And one further question,</p> <p>17 are you aware whether the permanent observer to the</p> <p>18 United Nations maintains a list of notaries public,</p> <p>19 in the United States similar to the one maintained</p> <p>20 by the General Delegations PLO to the United States?</p> <p>21 A. I don't know anything about the Mission of</p> <p>22 the UN; I don't know anything about it.</p> <p>23 Q. Okay. Were you aware that any time after</p> <p>24 January 4, 2020, that's January 4 of last year, the</p> <p>25 Palestinian Authority has referred any customer to</p>	<p style="text-align: right;">Page 149</p> <p>1 A. ABU HBDA</p> <p>2 Mission in New York has referred any customers or</p> <p>3 clients to Awni Abu Hbda Documentation Services on</p> <p>4 or after January 4, 2020?</p> <p>5 A. No, they didn't.</p> <p>6 Q. And on or after January 4, 2020, have you</p> <p>7 been paid any money or given anything of value by</p> <p>8 the Palestinian Liberation Organization?</p> <p>9 A. No.</p> <p>10 Q. And on or after January 4, 2020, have you</p> <p>11 been paid any money, or given anything of value by</p> <p>12 the Palestinian Liberation Organization?</p> <p>13 A. No.</p> <p>14 Q. And on or after January 4th, 2020, have</p> <p>15 you been given any -- have you been paid any money</p> <p>16 or given anything of value by the, you know, by the</p> <p>17 office in Canada that we referred to before, the one</p> <p>18 to which you sent the document with the red and the</p> <p>19 blue stamp?</p> <p>20 A. No.</p> <p>21 Q. And on or after January 4, 2020, have you</p> <p>22 been paid any money, or given anything of value by</p> <p>23 the Permanent Observer Mission to the United Nations</p> <p>24 in New York City, the one we've been talking about?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 150</p> <p>1 A. ABU HBDA</p> <p>2 Q. On or after January 4, 2020, have you</p> <p>3 entered into any agreements with the Palestinian</p> <p>4 Authority?</p> <p>5 A. No.</p> <p>6 Q. On or after January 4, 2020, have you</p> <p>7 entered into any agreements with the Palestinian</p> <p>8 Liberation Organization?</p> <p>9 A. No.</p> <p>10 Q. And on or after January 4, 2020, have you</p> <p>11 entered into any agreements with the office in</p> <p>12 Canada that we've been talking about to which you</p> <p>13 sent the document, the red and the blue stamp?</p> <p>14 A. No.</p> <p>15 Q. And on or after January 4, 2020, have you</p> <p>16 entered into any agreements with the Permanent</p> <p>17 Observer Mission to the United Nations Mission in</p> <p>18 New York?</p> <p>19 A. No.</p> <p>20 Q. By the way, just to clarify, you</p> <p>21 understand that my questions about the Permanent</p> <p>22 Observer Mission, you know, the Permanent Observer</p> <p>23 Mission to the United Nations in New York, that's a</p> <p>24 reference to the -- hang on one second, the -- the</p> <p>25 entity whose Website, you know, we looked at as</p>	<p style="text-align: right;">Page 152</p> <p>1 A. ABU HBDA</p> <p>2 A. On TV.</p> <p>3 Q. And do you know from where Mr. Mansour</p> <p>4 delivered the speech that you delivered on TV?</p> <p>5 Sorry, let me withdraw that.</p> <p>6 Do you know where Mr. Mansour delivered</p> <p>7 the speeches that you saw him deliver on television?</p> <p>8 A. How would I know, but most of them are in</p> <p>9 the UN.</p> <p>10 Q. Do you know the locations of any are --</p> <p>11 that are not in the UN?</p> <p>12 A. No, I don't know.</p> <p>13 Q. Have you ever seen Mr. -- apart from</p> <p>14 social gatherings, have you ever seen Mr. Mansour in</p> <p>15 person, other than at the United Nations</p> <p>16 headquarters?</p> <p>17 A. No.</p> <p>18 Q. Okay. And turning back to just</p> <p>19 momentarily -- and we could put the list up if we</p> <p>20 need to -- turning back to the list of personnel</p> <p>21 from Exhibit 9, the list of personnel from the</p> <p>22 Permanent Observer Mission in New York, have you</p> <p>23 ever seen -- and apart from the social occasions</p> <p>24 that you mentioned with respect to Mr. Mansour, have</p> <p>25 you ever seen any of those individuals, other than</p>
<p style="text-align: right;">Page 151</p> <p>1 A. ABU HBDA</p> <p>2 Exhibit 9; you understand that, correct?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And apart from seeing Mr. Mansour at the</p> <p>5 United Nations, or seeing Mr. Mansour at social --</p> <p>6 on social occasions of the sort that you described,</p> <p>7 that is to say family events, I suppose it was</p> <p>8 funerals you mentioned -- let me withdraw that.</p> <p>9 You mentioned before that you've seen</p> <p>10 Mr. Mansour at certain types of events outside of</p> <p>11 the United Nations; do you remember that?</p> <p>12 A. Maybe; yes.</p> <p>13 Q. Can you just give us a description of the</p> <p>14 sort of events those were? I know we're going back</p> <p>15 a little bit, but I just want to try to refresh your</p> <p>16 recollection.</p> <p>17 A. It's from gathering, maybe a wedding, a</p> <p>18 funeral; it's something -- it's not related, and</p> <p>19 even if it's in New York, it's not in the same area.</p> <p>20 Q. Okay. Apart from these social gatherings,</p> <p>21 are you aware of any other activities that</p> <p>22 Mr. Mansour engages in here in the United States?</p> <p>23 A. How would I know?</p> <p>24 Q. Well, have you ever attended, for example,</p> <p>25 a speech that Mr. Mansour delivered?</p>	<p style="text-align: right;">Page 153</p> <p>1 A. ABU HBDA</p> <p>2 the individuals from the UN headquarters in New</p> <p>3 York?</p> <p>4 A. No. No.</p> <p>5 Q. Okay. Let me go on mute for 30 seconds.</p> <p>6 I think I'm done. I just want to confirm. Hang on</p> <p>7 one sec.</p> <p>8 MR. SINAIKO: Okay. Mr. Abu Hbda, I have</p> <p>9 no further questions for you at this time, and I'm</p> <p>10 prepared to hand the Witness over to Mr. Berger,</p> <p>11 if he'd like to examine.</p> <p>12 MR. BERGER: Yes. Thank you. And thank</p> <p>13 you for your patience.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 154</p> <p>1 A. ABU HBDA</p> <p>2 EXAMINATION BY</p> <p>3 MR. BERGER:</p> <p>4 Q. Mr. Abu Hbda, I won't take very much of</p> <p>5 your time. My name is Mitchell Berger. I'm one of</p> <p>6 the lawyers for the Palestinian Liberation</p> <p>7 Organization, and for the record, have we ever met</p> <p>8 before.</p> <p>9 A. No.</p> <p>10 Q. Thank you. I want to take you back to a</p> <p>11 question that Mr. Sinaiko asked you, and an answers</p> <p>12 you gave earlier this afternoon. It was at Page 74,</p> <p>13 starting at Line 1 of the --</p> <p>14 MR. SINAIKO: Would you mind if I just --</p> <p>15 back there? I just need a moment.</p> <p>16 MR. BERGER: Go ahead. Let me know when</p> <p>17 you're -- you're at Page 74 line --</p> <p>18 MR. SINAIKO: Go ahead. Okie Doke. I'm</p> <p>19 there.</p> <p>20 Q. Okay. So, Mr. Abu Hbda, you were asked</p> <p>21 this question and you gave this answer. Question,</p> <p>22 "Sir, have you ever had personal authority to</p> <p>23 provide certification of a document on behalf of the</p> <p>24 Palestinian Authority?"</p> <p>25 And you gave the answer, "no."</p>	<p style="text-align: right;">Page 156</p> <p>1 A. ABU HBDA</p> <p>2 MS. KROFF: Yeah.</p> <p>3 MR. SINAIKO: So, while we're on the</p> <p>4 record, in light of Mr. Abu Hbda's testimony</p> <p>5 today, can we withdraw the Confidential</p> <p>6 designation on the document that was produced to</p> <p>7 us? Can you withdraw that designation?</p> <p>8 MS. KROFF: You know, let me just double</p> <p>9 check my client candidly -- I put that on because</p> <p>10 my client -- let me talk to him about that and get</p> <p>11 back to you.</p> <p>12 MR. SINAIKO: It seems pretty clear from</p> <p>13 the testimony that there's no basis for the</p> <p>14 confidential designation or run around getting</p> <p>15 confidential designations withdrawn. I figured I</p> <p>16 would just ask.</p> <p>17 MS. KROFF: Can you send me whatever</p> <p>18 Protective Order's in place, so I could look at</p> <p>19 the language?</p> <p>20 MR. SINAIKO: Erica, could you take a look</p> <p>21 at that?</p> <p>22 MS. LAI: We could go off the record.</p> <p>23 (Continued on next page to accommodate</p> <p>24 jurat.)</p> <p>25</p>
<p style="text-align: right;">Page 155</p> <p>1 A. ABU HBDA</p> <p>2 Do you recall being asked that question</p> <p>3 and being given that answer?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. I would like to use Mr. Sinaiko's</p> <p>6 phrasing of, "on behalf of," and ask you two</p> <p>7 questions, if I may. Is that all right with you?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Since January 4, 2020, have you</p> <p>10 provided any services on behalf of the Palestinian</p> <p>11 Authority?</p> <p>12 MR. SINAIKO: Objection.</p> <p>13 A. No.</p> <p>14 Q. Since January 4, 2020, have you provided</p> <p>15 any services on behalf of the Palestinian Liberation</p> <p>16 Organization?</p> <p>17 MR. SINAIKO: Objection.</p> <p>18 A. No.</p> <p>19 MR. BERGER: That's all I have. Thank</p> <p>20 you.</p> <p>21 MR. SINAIKO: Mr. Abu Hbda, we really</p> <p>22 appreciate your time today and your patience.</p> <p>23 THE VIDEOGRAPHER: We are now --</p> <p>24 MR. SINAIKO: Before we go off the record,</p> <p>25 I had one question to ask of Sara.</p>	<p style="text-align: right;">Page 157</p> <p>1</p> <p>2 THE VIDEOGRAPHER: Okay. If everyone's</p> <p>3 ready. We are now off the record. The time is</p> <p>4 20:54 UTC Time, and this concludes today's</p> <p>5 testimony given by Awni Abu Hbda Documentation</p> <p>6 Services. Thank you, everyone. Thank you,</p> <p>7 Mr. Abu Hbda.</p> <p>8 -oOo-</p> <p>9 (Whereupon, the examination of AWNI ABU HBDA</p> <p>10 was concluded at 4:54 p.m.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14 _____</p> <p>15 AWNI ABU HBDA</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Awni Abu Hba
April 07, 2021

158 to 159

<p>Page 158</p> <p>1</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 I, AMBRIA IANAZZI, do hereby Certify:</p> <p>5 THAT Awni Abu HBDA was sworn under penalty of</p> <p>6 perjury by a Notary Public.</p> <p>7</p> <p>8 THAT the deposition transcript herein is a</p> <p>9 verbatim record of the testimony given by Awni ABU</p> <p>10 HBDA, stenographically record by a Registered</p> <p>11 Professional Reporter, and Certified Realtime</p> <p>12 Reporter.</p> <p>13</p> <p>14 THAT I am not related to any of the Parties</p> <p>15 to this Action by blood or marriage; and I have no</p> <p>16 interest, financial or otherwise, in the outcome of</p> <p>17 the case.</p> <p>18</p> <p>19</p> <p>20 CERTIFICATION DATE: April 12th, 2021.</p> <p>21</p> <p>22</p> <p>23</p> <p>24 <u><i>Ambria Ianazzi</i></u></p> <p>25 AMBRIA IANAZZI, RPR, CRR, RCR, CSR</p>	<p>Page 159</p> <p>1 Errata Sheet</p> <p>2</p> <p>3 NAME OF CASE: SHABTAI SCOTT SHATSKY -against- PALESTINE LIBERATION ORGANIZATION</p> <p>4 DATE OF DEPOSITION: 04/07/2021</p> <p>5 NAME OF WITNESS: Awni Abu Hba</p> <p>6 Reason Codes:</p> <p>7 1. To clarify the record.</p> <p>8 2. To conform to the facts.</p> <p>9 3. To correct transcription errors.</p> <p>10 Page ____ Line ____ Reason ____</p> <p>11 From ____ to ____</p> <p>12 Page ____ Line ____ Reason ____</p> <p>13 From ____ to ____</p> <p>14 Page ____ Line ____ Reason ____</p> <p>15 From ____ to ____</p> <p>16 Page ____ Line ____ Reason ____</p> <p>17 From ____ to ____</p> <p>18 Page ____ Line ____ Reason ____</p> <p>19 From ____ to ____</p> <p>20 Page ____ Line ____ Reason ____</p> <p>21 From ____ to ____</p> <p>22 Page ____ Line ____ Reason ____</p> <p>23 From ____ to ____</p> <p>24</p> <p>25</p>
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Exhibits	EX 0007 Awni Abu Hba 04072 1	1	15-minute 43:9
EX 0001 Awni Abu Hba 04072 1	3:12 124:13, 14	1	15:22 44:15
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